

FILED IN CLERK'S OFFICE  
**ORIGINAL**  
 MONTY S. THOMAS, Clerk  
 Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF GEORGIA  
 ATLANTA DIVISION

SARA LARIOS, WHIT AYRES, §  
 VIRGINIA A. BALFOUR, §  
 GEORGIA BENTON, PAM §  
 BOHANNON, MERRI BRANTLEY, §  
 JOEY BRUSH, CRAIG BURNSED, §  
 ASHLENE CORR, DONALD CORR, §  
 ROBERT F. DALLAS, RETA DODD, §  
 P. MARTIN ELLARD, SETH HARP, §  
 DAVID MARKEY, FELIX MORING, §  
 ROBERT H. OWEN, SR., LINDA §  
 PARKER, CHARLES PAYNE, JR., §  
 ROY ROBERTS, NANCY §  
 SCHAEFER, AUSTIN SCOTT, §  
 BOB TANGO, DEBBIE TANGO, §  
 CHARLIE TANKSLEY, DON §  
 THOMAS, MARC TYSON, JACK §  
 WILLIAMSON and DAVID YOUNG; §  
 PLAINTIFFS, §

v. §  
 §  
 GEORGE E. "SONNY" PERDUE, in §  
 his official capacity as Governor §  
 of Georgia; TERRY COLEMAN, in his §  
 official capacity as Speaker of the House §  
 of Representatives of Georgia; ERIC B. §  
 JOHNSON, in his official capacity as §  
 President Pro Tem of the Georgia State §  
 Senate; and CATHY COX, §  
 in her official capacities as Secretary of §  
 State of Georgia and Chair of the State §  
 Election Board, §  
 DEFENDANTS. §

CIVIL ACTION FILE

NO. \_\_\_\_\_

1:03-CV-0693

**CAP**

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COMPLAINT FOR DECLARATORY, INJUNCTIVE AND OTHER RELIEF

COME NOW SARA LARIOS, WHIT AYRES, VIRGINIA A. BALFOUR, GEORGIA BENTON, PAM BOHANNON, MERRI BRANTLEY, JOEY BRUSH, CRAIG BURNSED, ASHLENE CORR, DONALD CORR, ROBERT F. DALLAS, RETA DODD, P. MARTIN ELLARD, SETH HARP, DAVID MARKEY, FELIX MORING, ROBERT H. OWEN, SR., LINDA PARKER, CHARLES PAYNE, JR., ROY ROBERTS, NANCY SCHAEFER, AUSTIN SCOTT, BOB TANGO, DEBBIE TANGO, CHARLIE TANKSLEY, DON THOMAS, MARC TYSON, JACK WILLIAMSON AND DAVID YOUNG, all Plaintiffs in the above-styled action (“Plaintiffs”), and, for their Complaint for Declaratory, Injunctive and other Relief, show this Court as follows:

NATURE OF THE CASE

1.

This is an action challenging the validity, under both the United States Constitution and federal statutes, of Georgia’s Congressional Representative districts (“the current Congressional redistricting plan”) and the constitutionality of the current electoral representational plans for the Georgia Senate and the Georgia House of Representatives (collectively, “the current state legislative redistricting

plans”). The challenge to the current Congressional redistricting plan is brought under Article I, § 2 and Article IV, §2 of the United States Constitution, the First and the Fourteenth Amendments to the United States Constitution, the provisions of 2 U.S.C. §§ 2a, 2b and 2c and 42 U.S.C. §§ 1983. The challenge to the current state legislative redistricting plans is brought pursuant to Article IV, §2 and the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983. Plaintiffs seek declaratory judgment that (1) the districts contained in the current Congressional and state legislative redistricting plans violate Article IV, § 2 of the United States Constitution and the Fourteenth Amendment to United States Constitution in that the disproportionate sizes of the districts and the use of multimember districts in the current House redistricting plan districts violate the constitutional principle of “one person, one vote;” (2) the current Congressional redistricting plan violates Article I, § 2 of the United States Constitution and the provisions of 2 U.S.C. §§2a, 2b and 2c; (3) the districts contained in the current Congressional and state legislative redistricting plans impinge upon the freedom of association rights guaranteed by the First Amendment of the United States Constitution by penalizing Republican voters and Representatives solely because of their party affiliation and political beliefs; and (4) the continued use of the districts in the current Congressional and state legislative redistricting plans cannot

be justified as furthering any legitimate state interest and is therefore unconstitutional. Upon such declarations, Plaintiffs request injunctive relief, prohibiting further qualifications or elections from being conducted under the current Congressional and state legislative redistricting plans. Plaintiffs further request that, in the event that constitutional plans are not enacted and precleared under 42 U.S.C. § 1973c in sufficient time for 2004 candidate qualifying period and elections to proceed according to the statutory schedule, the Court formulate and implement redistricting plans for Georgia's Congressional and state legislative districts that comport with constitutional and statutory requirements. Finally, Plaintiffs seek their costs and attorney's fees pursuant to 42 U.S.C. §1988.

#### STATEMENT OF JURISDICTION

##### 2.

This action arises under Article I, § 2 and Article IV, §2 of the United States Constitution, the First and Fourteenth Amendments to the United States Constitution, 2 U.S.C. §§ 2a, 2b and 2c and 28 U.S.C. §§2201 and 2202. This action is brought under 42 U.S.C. §§ 1983 and 1988.

##### 3.

This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1343(a)(3) and (4), 1983, 2201, 2202 and 2284.

4.

Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) and Local Rule 3.1B(1).

5.

A three-judge court is required pursuant to 28 U.S.C. § 2284(a) because this action challenges the constitutionality of the apportionment of Georgia's Congressional and state legislative districts. In this Complaint and by separate pleading, Plaintiffs request the appointment of a three-judge court.

6.

Plaintiffs have complied with the provisions of O.C.G.A. § 21-2-32(g) by providing a copy of this action to the Chair of the Georgia State Election Board via certified mail, in addition to personal service. A copy has also been served upon the Georgia Attorney General by certified mail.

#### PARTIES

7.

Plaintiff Sara Larios is a Republican, a registered voter of the State of Georgia and resides in the Eighth Congressional District, Georgia Senate District 17 and Georgia House of Representatives District 48. Georgia Senate District 17 has a population deviation of 4.97% and Georgia House of Representatives District

48 is a multimember district with a population deviation of -.27%. Plaintiff Larios desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

8.

Plaintiff Whit Ayres is a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 56 and Georgia House of Representatives District 40. Georgia Senate District 56 has a population deviation of 4.97% and Georgia House of Representatives District 40 is a single member district with a population deviation of 4.17%. Plaintiff Ayres desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

9.

Plaintiff Virginia Ann Balfour is a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 09 and Georgia House of Representatives District 70. Georgia Senate District 09 has a

population deviation of 4.98% and Georgia House of Representatives District 70 is a multimember district with a population deviation of 3.05%. Plaintiff Balfour desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

10.

Plaintiff Georgia Benton is a registered voter of the State of Georgia and resides in the Twelfth Congressional District, Georgia Senate District 2 and Georgia House of Representatives District 123. The Twelfth Congressional District is overpopulated by 8 people; Georgia House of Representatives District 123 is a single member district with a population deviation of 4.98%. Plaintiff Benton desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

11.

Plaintiff Pam Bohannon is a Republican, a registered voter of the State of Georgia and resides in the First Congressional District, Georgia Senate District 16

and Georgia House of Representatives District 117. The First Congressional District is overpopulated by 34 people; Georgia Senate District 16 has a population deviation of 4.97% and Georgia House of Representatives District 117 is a single member district with a population deviation of 4.99%. Plaintiff Bohannon desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

12.

Plaintiff Merri Brantley is a Republican, a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 48 and Georgia House of Representatives District 64. Georgia Senate District 48 has a population deviation of 4.79% and Georgia House of Representatives District is a single member district with a population deviation of 4.79%. Plaintiff Brantley desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.



13.

Plaintiff Joey Brush is a Republican, a registered voter of the State of Georgia and resides in the Ninth Congressional District, Georgia Senate District 24 and Georgia House of Representatives District 79. Plaintiff Brush is the State Senator for Senate District 24. The Ninth Congressional District is overpopulated by 35 people; Georgia Senate District 24 has a population deviation of 4.25% and Georgia House of Representatives District 79 is a single member district with a population deviation of -1.56%. Plaintiff Brush desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

14.

Plaintiff Craig Burnsed is a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 30 and Georgia House of Representative District 26. Georgia Senate District 30 has a population deviation of 4.91% and Georgia House of Representatives District 26 is a single member district with a population deviation of 4.79%. Plaintiff Burnsed

desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

15.

Plaintiff Bob Clarke is a Republican, a registered voter of the State of Georgia and resides in the Tenth Congressional District, Georgia Senate District 53 and Georgia House of Representatives District 01. Georgia Senate District 53 has a population deviation of 4.97% and Georgia House of Representatives District 01 is a single member district with a population deviation of -3.2%. Plaintiff Clarke desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

16.

Plaintiff Ashlene Corr is a Republican, a registered voter of the State of Georgia and resides in the Eighth Congressional District, Georgia Senate District 28 and Georgia House of Representatives District 87. Georgia Senate District 28 has a population deviation of 4.97% and Georgia House of Representatives District

87 is a single member district with a population deviation of 4.93%. Plaintiff Corr desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

17.

Plaintiff Donald Corr is a Republican, a registered voter of the State of Georgia and resides in the Eighth Congressional District, Georgia Senate District 28 and Georgia House of Representatives District 87. Georgia Senate District 28 has a population deviation of 4.97% and Georgia House of Representatives District 87 is a single member district with a population deviation of 4.93%. Plaintiff Corr desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

18.

Plaintiff Robert F. Dallas is a Republican, a registered voter of the State of Georgia and resides in the Fourth Congressional District, Georgia Senate District 42 and Georgia House of Representatives District 52. Georgia Senate District 42

has a population deviation of 4.64% and Georgia House of Representatives District 52 is a single member district with a population deviation of 2.00%. Plaintiff Dallas desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

19.

Plaintiff Reta Dodd is a Republican, a registered voter of the State of Georgia and resides in the Thirteenth Congressional District, Georgia Senate District 44 and Georgia House of Representatives District 82. The Thirteenth Congressional District is overpopulated by 5 people; Georgia Senate District 44 has a population deviation of 2.09% and Georgia House of Representatives District 82 is a single member district with a population deviation of -4.45%. Plaintiff Dodd desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

20.

Plaintiff P. Martin Ellard is a Republican, a registered voter of the State of Georgia and resides in the Tenth Congressional District, Georgia Senate District 49 and Georgia House of Representatives District 20. Georgia Senate District 49 has a population deviation of 4.61% and Georgia House of Representatives District 20 is a single member district with a population deviation of 4.75%. Plaintiff Ellard desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

21.

Plaintiff Seth Harp is a Republican, a registered voter of the State of Georgia and resides in the Eighth Congressional District, Georgia Senate District 16 and Georgia House of Representatives District 109. Plaintiff Harp is the State Senator from Senate District 16. Georgia Senate District 16 has a population deviation of 4.97% and Georgia House of Representatives District 109 is a single member district with a population deviation of -2.43%. Plaintiff Harp desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased

through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

22.

Plaintiff David Markey is a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 21 and Georgia House of Representatives District 35. Georgia Senate District 21 has a population deviation of 4.98% and Georgia House of Representatives District 35 is a single member district with a population deviation of 4.98%. Plaintiff Markey desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

23.

Plaintiff Felix Moring is a Republican, a registered voter of the State of Georgia and resides in the Third Congressional District, Georgia Senate District 20 and Georgia House of Representatives District 119. The Third Congressional District is overpopulated by 21 people; Georgia Senate District 20 has a population deviation of -4.91% and Georgia House of Representatives District 119 is a single member district with a population deviation of -3.47%. Plaintiff Moring desires to

participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

24.

Plaintiff Robert H. Owen, Sr. is a Republican, a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 56 and Georgia House of Representatives District 41. Georgia Senate District 56 has a population deviation of 4.97% and Georgia House of Representatives District 41 is a single member district with a population deviation of 4.94%. Plaintiff Owen desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

25.

Plaintiff Linda Parker is a Republican, a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 21 and Georgia House of Representatives District 15. Georgia Senate District 21 has a population deviation of 4.98% and Georgia House of Representatives District

15 is a single member district with a population deviation of 3.89%. Plaintiff Parker desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

26.

Plaintiff Charles Payne, Jr. is a registered voter of the State of Georgia and resides in the Tenth Congressional District, Georgia Senate District 54 and Georgia House of Representatives District 04. Georgia Senate District 54 has a population deviation of 4.68% and Georgia House of Representatives District 04 is a single member district with a population deviation of 4.92%. Plaintiff Payne desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

27.

Plaintiff Roy Roberts is a registered voter of the State of Georgia and resides in the Ninth Congressional District, Georgia Senate District 45 and Georgia House of Representatives District 71. The Ninth Congressional District is overpopulated



by 35 people; Georgia Senate District 45 has a population deviation of 4.97% and Georgia House of Representatives District 71 is a multimember district with a population deviation of 1.82%. Plaintiff Roberts desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

28.

Plaintiff Nancy Schaefer is a Republican, a registered voter of the State of Georgia and resides in the Ninth Congressional District, Georgia Senate District 51 and Georgia House of Representatives District 07. The Ninth Congressional District is overpopulated by 35 people; Georgia Senate District 51 has a population deviation of 4.99% and Georgia House of Representatives District 07 is a single member district with a population deviation of 4.15%. Plaintiff Schaefer desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

29.

Plaintiff Austin Scott is a Republican, a registered voter of the State of Georgia and resides in the Second Congressional District, Georgia Senate District 13 and Georgia House of Representative District 138. Plaintiff Scott is the state Representative from House District. The Second Congressional District is overpopulated by 8 people; Georgia Senate District 13 has a population deviation of -4.70% and Georgia House of Representatives District 138 is a single member district with a population deviation of 3.10%. Plaintiff Scott desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

30.

Plaintiff Bob Tango is a Republican, a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 37 and Georgia House of Representatives District 28. Georgia Senate District 37 has a population deviation of 3.33% and Georgia House of Representatives District 28 is a single member district with a population deviation of 4.98%. Plaintiff Tango desires to participate in the electoral and political processes of the State on the

basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

31.

Plaintiff Debbie Tango is a Republican, a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 37 and Georgia House of Representatives District 28. Georgia Senate District 37 has a population deviation of 3.33% and Georgia House of Representatives District 28 is a single member district with a population deviation of 4.98%. Plaintiff Tango desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

32.

Plaintiff Charlie Tanksley is a Republican, a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 32 and Georgia House of Representatives District 44. Plaintiff Tanksley is the state Senator from Senate District 32. Georgia Senate District 32 has a population deviation of 4.86% and Georgia House of Representatives District 44 has a

population deviation of -.68%. Plaintiff Tanksley desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

33.

Plaintiff Don Thomas is a Republican, a registered voter of the State of Georgia and resides in the Tenth Congressional District, Georgia Senate District 54 and Georgia House of Representatives District 05. Plaintiff Thomas is the state Senator from Senate District 54. Georgia Senate District 54 has a population deviation of 4.68% and Georgia House of Representatives District 05 is a single member district with a population deviation of 1.87%. Plaintiff Thomas desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

34.

Plaintiff Marc Tyson is a Republican, a registered voter of the State of Georgia and resides in the Eleventh Congressional District, Georgia Senate District

06 and Georgia House of Representatives District 34. The Eleventh Congressional District is overpopulated by 3 people; Georgia Senate District 06 has a population deviation of -4.99% and Georgia House of Representatives District 34 is a multimember district with a population deviation of -4.42%. Plaintiff Tyson desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

35.

Plaintiff Jack Williamson is a registered voter of the State of Georgia and resides in the Twelfth Congressional District, Georgia Senate District 04 and Georgia House of Representatives District 101. The Twelfth Congressional District is overpopulated by 8 people; Georgia Senate District 04 has a population deviation of .10% and Georgia House of Representatives District 101 is a multimember district with a population deviation of 4.95%. Plaintiff Williamson desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

36.

Plaintiff David Young is a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 56 and Georgia House of Representatives District 38. Georgia Senate District 56 has a population deviation of 4.97% and Georgia House of Representatives District 38 is a single member district with a population deviation of 4.32%. Plaintiff Young desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts.

37.

Defendant George E. "Sonny" Perdue is a resident of Georgia, resides in this District and is the Governor of the State of Georgia. He is sued in his representative capacity as the Constitutional officer of the State charged with the duty of signing into law redistricting plans for Georgia's Congressional and state legislative districts which comport with federal constitutional and statutory requirements.

38.

Defendant Terry Coleman is a resident of the State of Georgia and is sued in his representative capacity as the Speaker of the Georgia House of Representatives, one of the bodies of the Georgia General Assembly charged with redistricting Georgia's Congressional and state legislative districts in a manner consistent with federal constitutional and statutory requirements. The Georgia House of Representatives passed the current redistricting plans.

39.

Defendant Eric B. Johnson is a resident of Georgia and is sued in his representative capacity as the President Pro Tem of the Georgia Senate and the highest officer elected by that body. The state Senate is one of the bodies of the General Assembly charged with redistricting Georgia's state legislative and Congressional Representative Districts in a manner consistent with federal constitutional and statutory requirements. The Georgia Senate passed the current redistricting plans.

40.

Defendant Cathy Cox is a resident of Georgia, resides in this District and is Georgia's Secretary of State and Chair of the State Elections Board. She is sued in her representative capacity as the Constitutional officer of the State charged with

the duty of conducting elections in Georgia in a manner consistent with federal constitutional and statutory requirements.

41.

While all of the above-named Defendants are sued in their official capacities and all Defendants act in their official capacities under color of state law, because the current redistricting plans violate federal constitutional and statutory mandates, Defendants' actions with respect to the conduct of elections under the current redistricting plans are outside the scope of their authority in those capacities.

### **BACKGROUND FACTS**

#### **The Congressional Plan**

42.

Prior to enactment of the current Congressional redistricting plan, the State of Georgia was divided into 11 Congressional Representative districts.

43.

Due to Georgia's significant population growth, as documented by the 2000 United States Decennial Census ("the 2000 decennial census"), Georgia was entitled to two additional Congressional districts, pursuant to 2 U.S.C. § 2a.



44.

Furthermore, due to material geographic shifts in the populations between Georgia's Congressional districts over the past decade, a fact also demonstrated by the 2000 decennial census, the number of persons represented by each member was not equal.

45.

Due to both the addition of the two new Congressional districts and the population shift geographically, the Georgia General Assembly was required to redistrict Georgia's Congressional districts following the release of the 2000 decennial census.

46.

During the second of two special redistricting sessions held during 2001, the General Assembly passed and then-Governor Roy E. Barnes signed into law the current Congressional redistricting plan. The current redistricting plan for Georgia's Congressional Representatives, is accurately represented by Exhibit "A" attached hereto.

47.

Under Supreme Court precedent, the state of Georgia was required to draw Congressional districts with as little population deviation as is practicable.

48.

The technology and statistics available to the state of Georgia to minimize population deviation in the Congressional redistricting plan allowed the drawing of districts with a deviation of 0 or 1 person.

49.

In fact, alternative Congressional redistricting plans were available to the General Assembly during 2001 which proved that one person deviations were not only possible but easily attained and therefore practicable.

50.

However, in the current Congressional redistricting plan, the population deviations are as follow:

<u>District Number</u>	<u>Total Deviation (by person)</u>
01	34
02	8
03	21
04	-37
05	0
06	-2
07	-21
08	-27
09	35
10	-25
11	-29
12	8
13	5
Overall deviation	72

51.

Based on the above deviations, the voting strength of citizens in Georgia's purported Congressional Districts 1, 2, 3, 9, 12 and 13, including that of Plaintiffs Bohannon, Scott, Moring, Brush, Roberts, Schaefer, Benton, Williamson and Dodd, is severely diluted, as citizens in other purported districts have disproportionately greater voting strength.

52.

Furthermore, 2 U.S.C. § 2c provides that a state's Congressional representatives are to be elected from single member districts.

53.

The purported "districts" in the current Congressional redistricting plan are gross partisan gerrymanders that do not constitute "districts" as contemplated by 2 U.S.C. § 2c.

54.

The current Congressional redistricting plan is so irrational on its face that the natural result will be to deprive citizens of the benefit of the principle of one person, one vote and their representational rights.

55.

There are no legitimate state policies, which, consistently applied, can explain or justify either the deviations or the shapes of the purported districts in the current Congressional redistricting plan.

56.

Unless Congressional districts of equal population are established, Georgia's Congressional Representatives will be elected from a malapportioned plan in violation of the federal constitutional and statutory law set forth above. Furthermore, unless a Congressional plan containing actual single member districts is adopted, Georgia's Congressional Representatives will be elected from "districts" that do not comport with 2 U.S.C. § 2c.

### **The State Legislative Districts**

57.

The 2000 decennial census showed an increase in population, as well as material geographic shifts in the population between Georgia's state legislative districts over the past decade. Therefore, after receipt of the 2000 decennial census figures, the General Assembly was required to redistrict Georgia's state legislative districts.

58.

The significant increase in northern Georgia's population, excluding urban Fulton County and DeKalb County, and the movement of population from southern to northern Georgia, meant that the northern part of the state would have more state legislative seats and the southern portion of the state would have fewer legislative seats, if those seats were apportioned in accordance with the constitutional mandate of one person, one vote.

59.

This trend of proportional population growth, as well as the shift of population from southern Georgia to northern Georgia, have been in process for at least five decades and are expected to continue through this decade. The effect of overpopulating the northern Georgia districts, i.e., the dilution of the votes of Plaintiffs and other citizens of those districts, was well-known to the Democratic leadership of the 2001-2002 General Assembly and to then-Governor Roy E. Barnes.

60.

During the General Assembly's special redistricting session in 2002, the third redistricting session of 2001-2002, the General Assembly passed and then-

Governor Barnes signed into law the current Senate redistricting plan. The current redistricting plan for the state Senate is accurately represented by Exhibit "B" attached hereto.

61.

The ideal size of each of the fifty-six state Senate districts in Georgia is 146,187. The current redistricting plan for the state Senate has an overall range of population deviation of 9.98%. Of the 56 districts, 29 districts are centered in the northern part of the state, 11 districts are centered in the area of Fulton and DeKalb counties and 16 districts are centered in southern Georgia.

62.

In the state Senate districts where Plaintiffs Larios, Ayres, Balfour, Bohannon, Brantley, Burnsed, Clarke, Corr, Dallas, Ellard, Harp, Markey, Owen, Parker, Payne, Roberts, Schaefer, Tanksley, Thomas and Young reside, the population deviations are all above 4.50%. Based on these deviations, the voting strength of citizens in state Senate Districts 9, 16, 17, 21, 28, 30, 32, 42, 45, 48, 49, 51, 53, 54 and 56, including that of the Plaintiffs listed, is severely diluted, as citizens in other districts have disproportionately greater voting strength.

63.

During the second special redistricting session of the General Assembly in 2001, the legislature passed and then Governor Barnes signed into law the current House redistricting plan. The current House redistricting plan is accurately represented by Exhibit "C" attached hereto.

64.

The ideal size of a single member state House district in Georgia is 45,480. The total range of population deviation in the current redistricting for the House of Representatives is 24.65%; the sizes of the districts range from 43,209 to 176,939.

65.

In the House redistricting plan in use immediately prior to the current House redistricting plan, the state House of Representatives was made up of 180 single-member districts. The current redistricting plan for the state House of Representatives divides that body into 147 districts, some single member and some multimember. The newly adopted multimember districts contain specific numbered seats or posts, but all voters within these multimember districts may vote for a candidate from each post and are represented by all members so elected.

66.

In the state House of Representatives districts where Plaintiffs Benton, Bohannon, Burnsed, Corr, Ellard, Markey, Owen, Payne, Tango and Williamson reside, the population deviations are all above 4.50%. Therefore, they are not afforded equal representation as residents of less-populated districts.

67.

In addition, Plaintiffs Ayres, Benton, Bohannon, Brantley, Brush, Burnsed, Clarke, Corr, Dallas, Ellard, Harp, Markey, Parker, Payne, Schaefer, Tango, Tanksley, Thomas and Young live in single districts, Multimember districts give Georgia voters who reside within them two, three and sometimes four times the representation of all voters in single member districts. While voters in single-member districts have, through their representative, only one vote on any given matter, voters in multimember districts have two, three or even four votes on the same matter.

68.

Based on the above deviations and the imposition of multi-member districts, the voting strength of citizens in state House Districts 4, 26, 28, 35, 41, 67, 87, 101, 117 and 123, including that of the Plaintiffs listed in the immediately preceding paragraph, is severely diluted, as citizens in other districts have



disproportionately greater voting strength. Furthermore, citizens living in single member districts, including the above-listed Plaintiffs, are afforded less representation than residents of multimember districts.

69.

The technology and statistics available to the state of Georgia in the state legislative redistricting process allowed the drawing of districts with minimal population deviations.

70.

In fact, alternative state legislative redistricting plans were available to the General Assembly which proved that lower population deviations were not only possible but easily attained and were therefore practicable. In addition, these alternative plans distributed state legislative seats geographically according to population figures.

71.

However, the Democrat leadership in the 2001-2002 General Assembly and then-Governor Roy E. Barnes systematically and intentionally used their knowledge of past and anticipated future growth to identify fast-growing state

legislative districts and slow or no growth districts, then overpopulated the fast-growth districts and underpopulated the slow-growth districts.

72.

The systematic and intentional overpopulating of the state legislative districts in northern Georgia and underpopulating of the districts in urban Fulton County, DeKalb County and southern Georgia, constitutes intentional and invidious discrimination against the voters of northern Georgia in that their votes are diluted vis-a-vis the voters in the underpopulated districts. Because of growth patterns, this dilution will be exacerbated throughout the decade, a fact known to the Democrat leadership of the 2001-2002 General Assembly and then-Governor Barnes.

73.

In addition, the Democrat leadership of the 2001-2002 General Assembly and then-Governor Barnes systematically and intentionally overpopulated districts of Republican incumbents or districts which were identified as likely to elect a Republican.

74.

By systematically packing voters perceived to be Republicans into overpopulated high growth districts, the Democrat-controlled General Assembly and then-Governor Barnes attempted to prevent the majority of Georgia voters from electing a legislature of their choice for this decade.

75.

The systematic and intentional overpopulation of districts represented by a Republican or designated as Republican-leaning constitutes intentional and invidious discrimination against voters living in those districts, including Plaintiffs and dilutes their votes.

76.

The growth trends of Georgia will exacerbate this vote dilution and increase the size of the majority which will be denied its ability to elect a legislature of its choice through the current decade.

77.

The current state legislative redistricting plans are so irrational on their face that the natural result will be to deprive citizens of the benefit of the principle of one person, one vote and their representational rights. There are no legitimate state

policies, consistently applied, which can explain or justify the population deviations in the current state legislative redistricting plans.

78.

Unless state legislative districts of equal population are established, members of Georgia's General Assembly will be elected from malapportioned plans in violation of the federal constitutional and statutory law set forth above. Furthermore, unless multimember districts are abolished, citizens living in those districts will be afforded greater representation to the detriment of voters residing in single member districts, including some Plaintiffs.

79.

A genuine controversy exists between Plaintiffs and Defendants as to the matters asserted herein. Plaintiffs have no adequate remedy at law and no other way to guarantee their rights in connection with future elections other than through the relief sought in this lawsuit. Plaintiffs will suffer irreparable harm if elections are allowed to proceed under the current Congressional and state legislative redistricting plans, and the injury will continue until those redistricting plans are declared to be unlawful, their use enjoined by this Court and districts which comport with the principle of one person, one vote are adopted.

COUNT ONE

**VIOLATION OF RIGHT TO EQUAL PROTECTION OF THE LAWS**

80.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-79 of this Complaint as if set forth herein.

81.

Article 4, Section 2 of the United States Constitution provides: “The citizens of each state shall be entitled to all privileges and immunities of citizens in the several states.” Pursuant to this and other provisions of the United States Constitution, the right to vote is a fundamental right guaranteed to U.S. citizens.

82.

Section 1 of the Fourteenth Amendment to the United States Constitution provides: “No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the united States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”

83.

Under the Fourteenth Amendment, it is unlawful for a state to create electoral districts for public office with an imbalance in population unless a legitimate governmental interest requires the same.

84.

The current version of 42 U.S.C. § 1983 provides, in relevant part:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory of the District of Columbia, subjects, or causes to be subjected any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress . . .

85.

Defendants are “person[s]” and Plaintiffs are all “citizen[s] of the United States” within the scope of 42 U.S.C. § 1983. The current redistricting plans were enacted by the 2001-2002 General Assembly and then-Governor Barnes, all acting under color of state law. The continued use of the current redistricting plans by Defendants is action taken under color of state law.

86.

Plaintiffs intend and desire to participate in the electoral and political processes of the State of Georgia on the basis of equality with other citizens of the State.

87.

Plaintiffs' constitutional right to such equality in voting strength has been diluted and debased through the enactment and continued use of the current redistricting plans by which members of the Georgia General Assembly and Georgia's Congressional Representatives are to be elected. The dilution and debasement occurs through the overpopulation of districts as well as the use of multimember districts in the state House because voters in less populated districts and voters in multimember districts are afforded more representation than those who live in overpopulated districts or single member House districts.

88.

According to the 2000 census, the purported Georgia Congressional districts are not equal in population. The population of the largest exceeds that of the smallest by 72 people. It was and is practicable to create Georgia Congressional districts containing an equal number of people, using the 2000 census.

89.

These malapportioned purported Congressional districts cause Plaintiffs and other voters living in those districts to be underrepresented and therefore deny them the right to equal protection of the laws under the Fourteenth Amendment. The population deviation is not as equal as is practicable, and there is no consistently applied legitimate state policy which can justify this deviation.

90.

With respect to state legislative districts with deviations of 4.5% and above, the current legislative redistricting plans contain such malapportioned districts as to cause Plaintiffs and other voters living in those districts to be underrepresented and therefore deny them the right to equal protection. Furthermore, the current state legislative redistricting plans also create a disparity of representation among Georgia voters based solely on the geographic location of their residence within a district perceived to be Republican-leaning.

91.

There is no consistently applied legitimate state policy which can justify the population deviations in the current state legislative redistricting plans. Instead, the population deviations are designed to maximize the electoral effectiveness of Democrat political supporters and to minimize or dissipate the voting strength of



Republican supporters. Thus, the current state legislative redistricting plans intentionally and invidiously discriminate against the Republican Party, its members and other citizens who it may support as candidates, in violation of the United States Constitutional guarantees of the Fourteenth Amendment.

92.

The current Congressional and state legislative redistricting plans are gross partisan gerrymanders, which violate the United States Constitution's Fourteenth Amendment equal protection guarantee by fragmenting cohesive communities of interest and political subdivisions between purported districts in support of no legitimate or rational state interest. No legitimate public policy or governmental purpose is supported or furthered by these plans' needless division of these communities. This wanton fragmentation of cultural, ethnic, geographic economic and political communities results in a diminution of dilution of their voting rights, political power and influence. Leaving the current redistricting plans in place will cause a continued violate Plaintiffs' constitutional rights to equal protection.

93.

There is no adequate remedy at law for the irreparable harm Plaintiffs suffer and continue to suffer through continued use of the current Congressional and state legislative redistricting plans. The use of those plans, which unconstitutionally

abridges the voting rights of Plaintiffs to elect and be represented by members of the United States House of Representatives and the General Assembly, should be declared unconstitutional and enjoined. In the event that the Georgia General Assembly is unable to pass constitutional redistricting plans in time for the 2004 elections, this Court should draw such plans for use until such time as the Georgia General Assembly enacts Congressional and state legislative redistricting plans that comport with constitutional and statutory law.

## COUNT TWO

### **VIOLATION OF FIRST AMENDMENT RIGHTS**

94.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-93 of this Complaint as if set forth herein.

95.

The First Amendment to the United States Constitution provides the right of freedom of speech and of association. The current state legislative redistricting plans impinge upon the freedom of association rights guaranteed by the First Amendment of the United States Constitution by packing Republican-leaning districts, thereby penalizing Republican voters and representatives solely because

of their party affiliation and political beliefs. Public debates on issues of public importance are also chilled in violation of the First Amendment.

96.

There is no consistently applied legitimate state policy which can justify the population deviations in these Republican-leaning districts in the current state legislative redistricting plans.

97.

There is no adequate remedy at law for the irreparable harm Plaintiffs suffer and continue to suffer through continued use of the current state legislative redistricting plans. The use of those plans, which unconstitutionally abridges the voting rights of Plaintiffs to elect and be represented by members of the General Assembly on an equal basis with all other citizens, should be declared unconstitutional and enjoined. In the event that the Georgia General Assembly is unable to pass constitutional state legislative redistricting plans in time for the 2004 elections, this Court should draw such plans for use until such time as the Georgia General Assembly enacts plans that comport with constitutional and statutory law.

COUNT THREE

**VIOLATION OF ARTICLE I, § 2 OF THE UNITED STATES CONSTITUTION**

98.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-97 of this Complaint as if set forth herein.

99.

Article 1, Section 2 of the United States Constitution requires that congressional representative districts within a state have an equal number of people. The current Georgia Congressional redistricting plan violates this one person, one vote requirement.

100.

There is no adequate remedy at law for the irreparable harm Plaintiffs will suffer through continued use of the purported Georgia Congressional redistricting plan. The use of that plan, which unconstitutionally abridges the voting rights of Plaintiffs to elect and be represented by members of the United States House of Representatives should be declared unconstitutional under Article I, Section 2 of the United States Constitution and enjoined. In the event that the Georgia General Assembly is unable to pass constitutional Congressional redistricting plans in time for the 2004 elections, this Court should draw such plans for use until such time as

the Georgia General Assembly enacts a Congressional plan that comports with constitutional law.

**COUNT FOUR**

**VIOLATION OF 2 U.S.C. § 2**

101.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-100 of this Complaint as if set forth herein.

102.

2 U.S.C. § 2c requires that any state entitled to more than one Representative in the United States Congress establish single member districts for the election of such Representatives. The Georgia Congressional Representative Plan violates 2 U.S.C. § 2c because Georgia has failed to create such congressional districts. Although the Georgia Congressional Plan purportedly contains congressional Representative districts, these districts are amalgamations of census geography or blocs bearing no identifiable relationship to any geographic entity. These purported districts are neither compact nor contiguous. They were created solely for partisan political purposes, and fail to have the minimum rational geographic or representational basis to constitute a single member district as contemplated. They

are not Congressional Representative districts as contemplated and required by federal statute.

103.

There is no adequate remedy at law for the irreparable harm Plaintiffs will suffer through continued use of the purported Georgia Congressional redistricting plan. Until Georgia is redistricted in the manner provided by Federal law, the Representatives from Georgia must be elected in the manner provided for in 2 U.S.C. § 2a (c). Accordingly, Plaintiffs are entitled to injunctive and declaratory relief declaring Georgia's current Congressional redistricting plan unconstitutional, and enjoining all future election of Georgia's Congressional delegation until those districts are created in a manner that does not violate the United States Constitution and federal statutes.

WHEREFORE, Plaintiff respectfully prays that this Court grant the following relief:

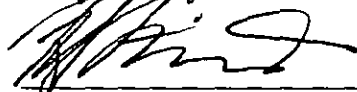
- A) Assume jurisdiction of this case;
- B) Make application to the Chief Judge of the Circuit to appoint a three-judge court to hear and decide this case in accordance with 28 U.S.C. § 2284, as this action involves statewide redistricting plans;

- C) Enter a declaratory judgment that the present apportionment of the current Congressional, Georgia Senate and Georgia House of Representatives districts violates the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983 in that the districts are not fair and equal, as practicable;
- D) Enter a declaratory judgment that the continued use of the current redistricting plans for Georgia's state legislative and Congressional districts violates the Article IV, §2 of the United States Constitution, the First and the Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983;
- E) Enter a declaratory judgment that the continued use of the current Congressional redistricting plan violates Article I, § 2 of the United States Constitution, the First and Fourteenth Amendments of the United States Constitution, 2 U.S.C. 2a, 2b, 2c and 42 U.S.C. § 1983.
- F) After entering the declaratory judgments as described above, enjoin all future elections of members of Georgia's General Assembly and Georgia's Congressional representatives until those plans are districted in a manner that does not violate federal statutes, the United States Constitution or the Georgia Constitution;

- G) In the event that new redistricting plans are not enacted and precleared under Section 5 of the Voting Rights Act of 1965, 42 U.S.C. § 1973c in time for such plans to be used in the 2004 elections, enter an order that creates Georgia's state legislative and Congressional districts in a manner consistent with the United States Constitution and federal statutes;
- H) Award Plaintiffs their costs and attorney's fees of this action, pursuant to 42 U.S.C. § 1988 or as otherwise authorized by law; and
- I) Award Plaintiffs all other relief which the Court deems necessary and proper.

This 13<sup>th</sup> day of March, 2003.

Respectfully submitted,



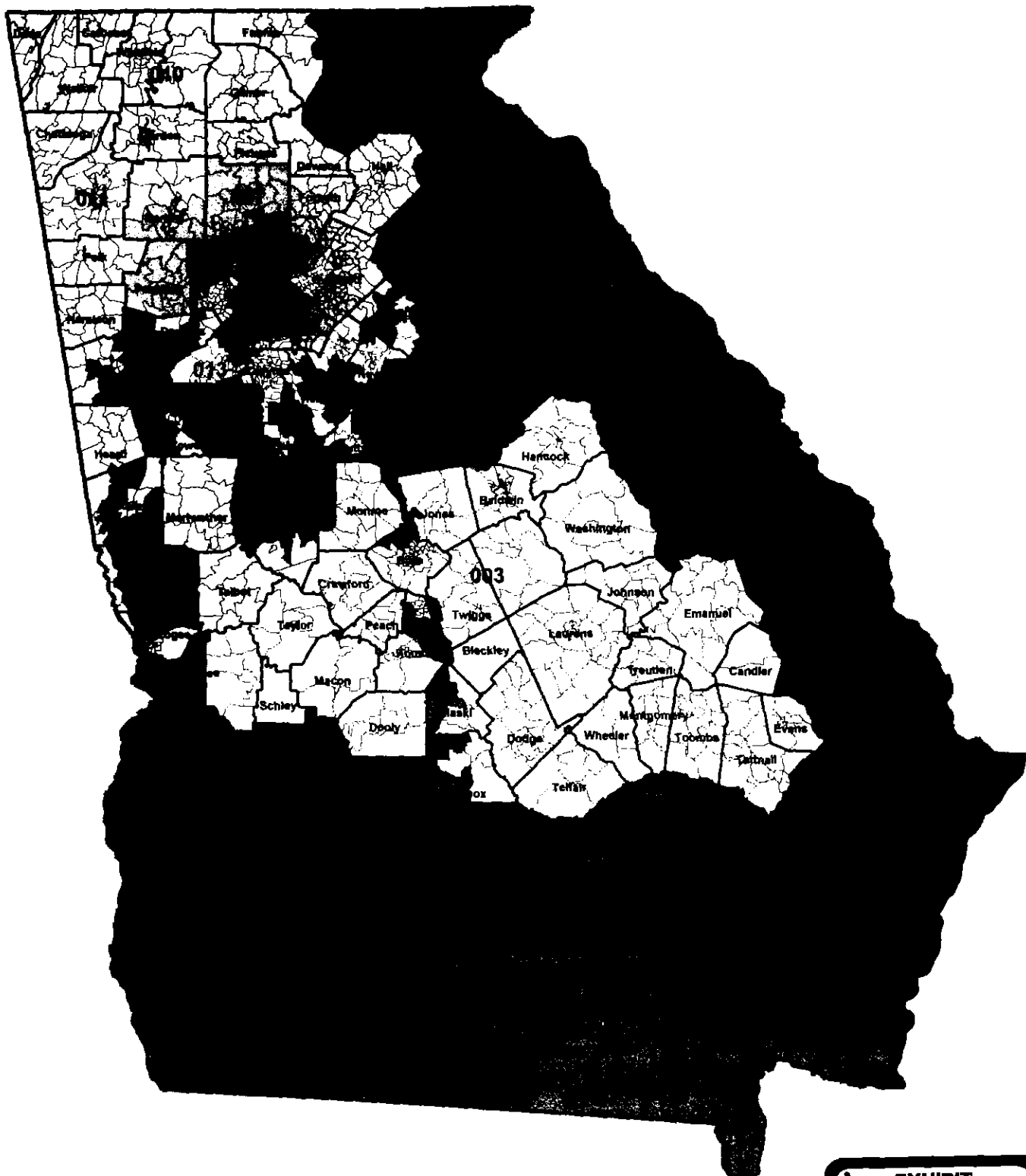
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## Map Layers

Districts

CPREC 4-23-02

County (Tiger)

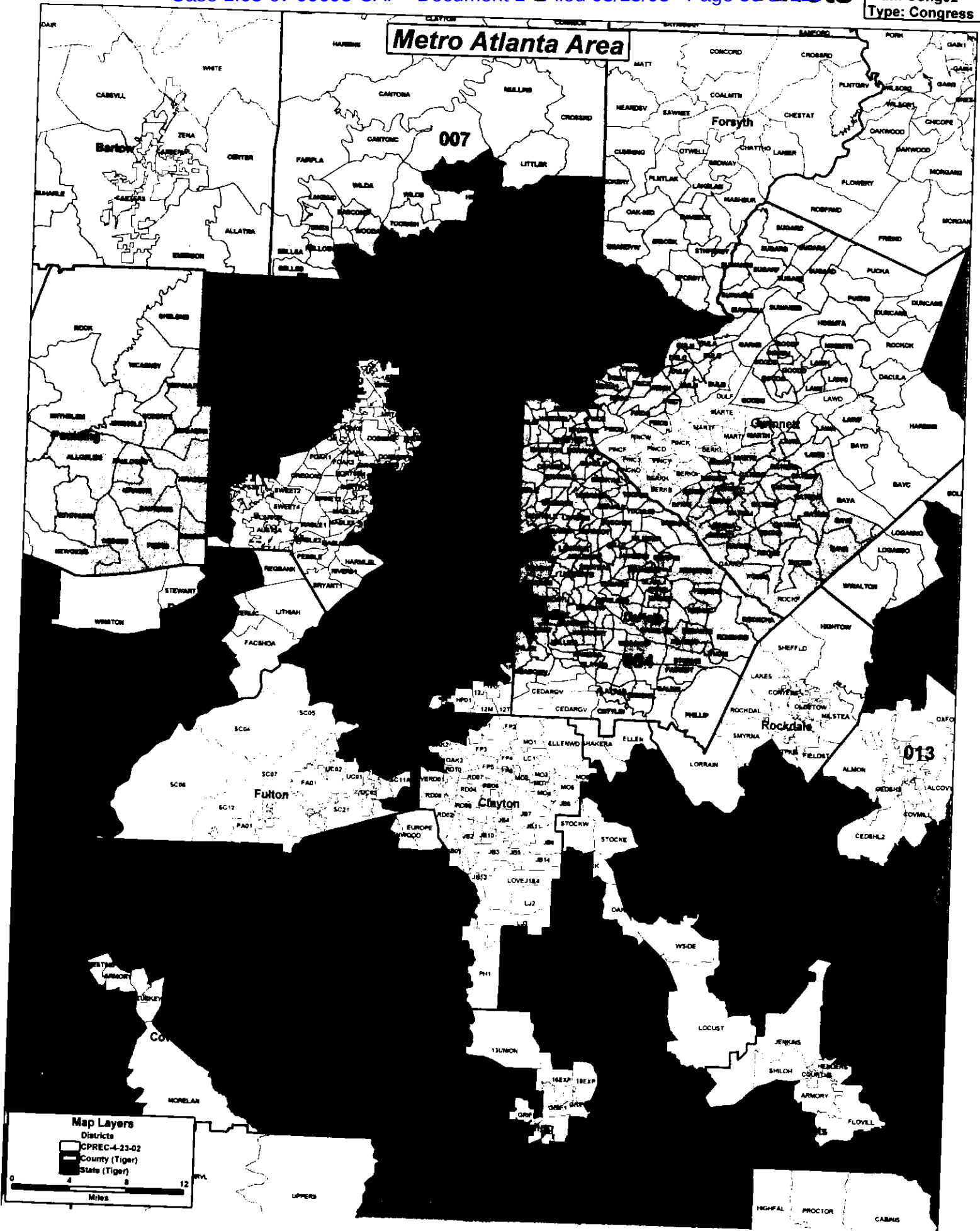
State (Tiger)

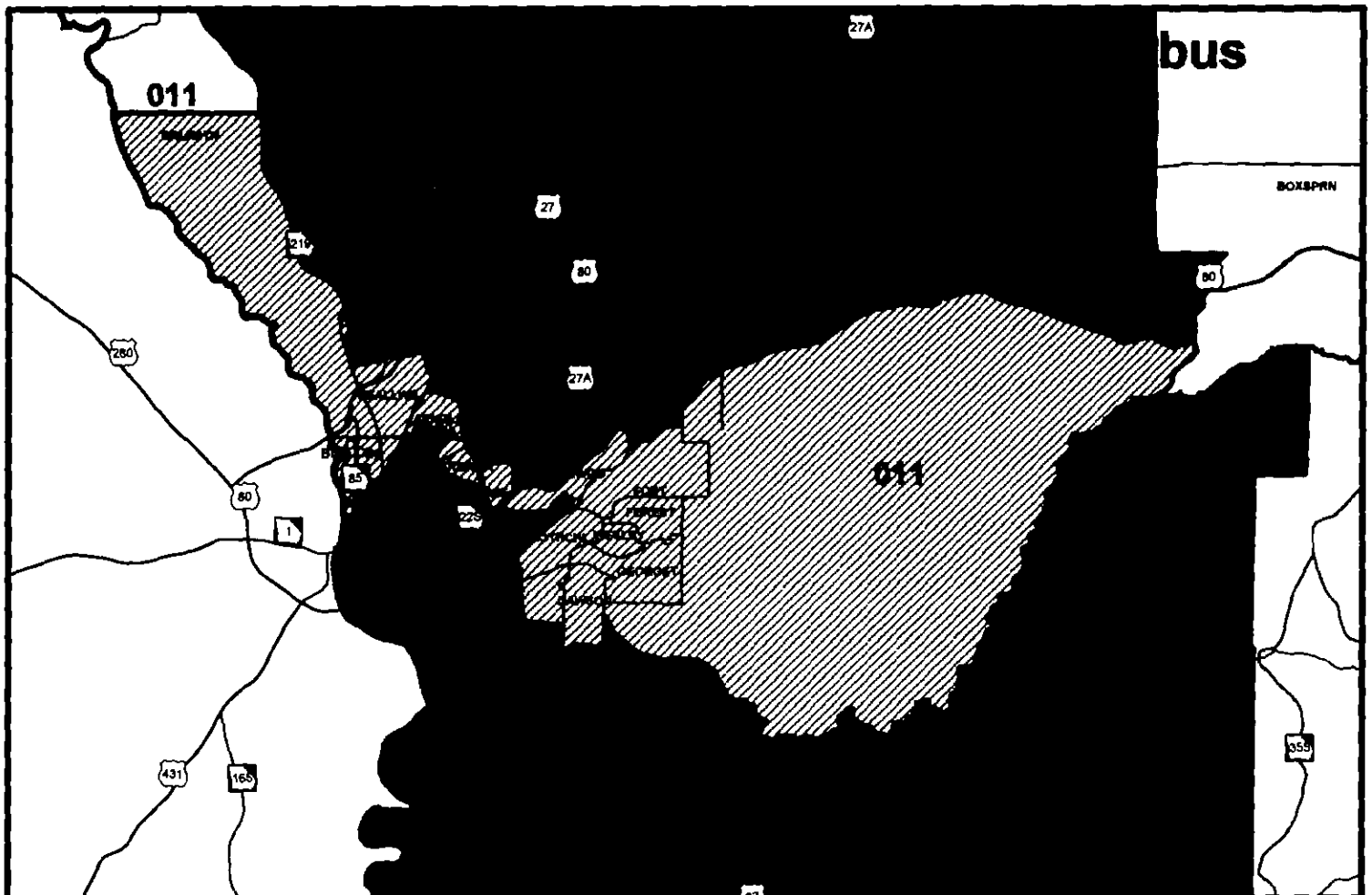
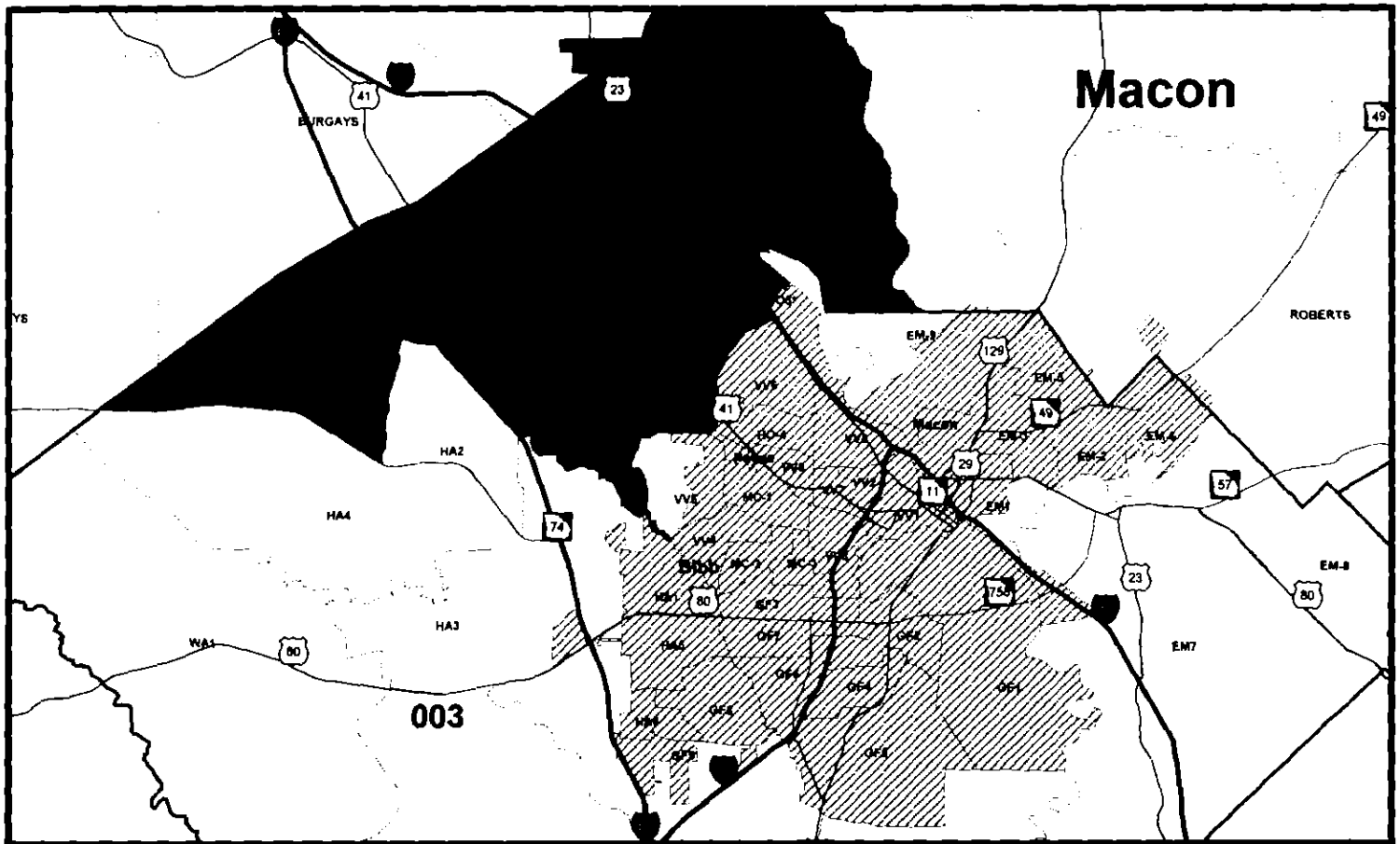
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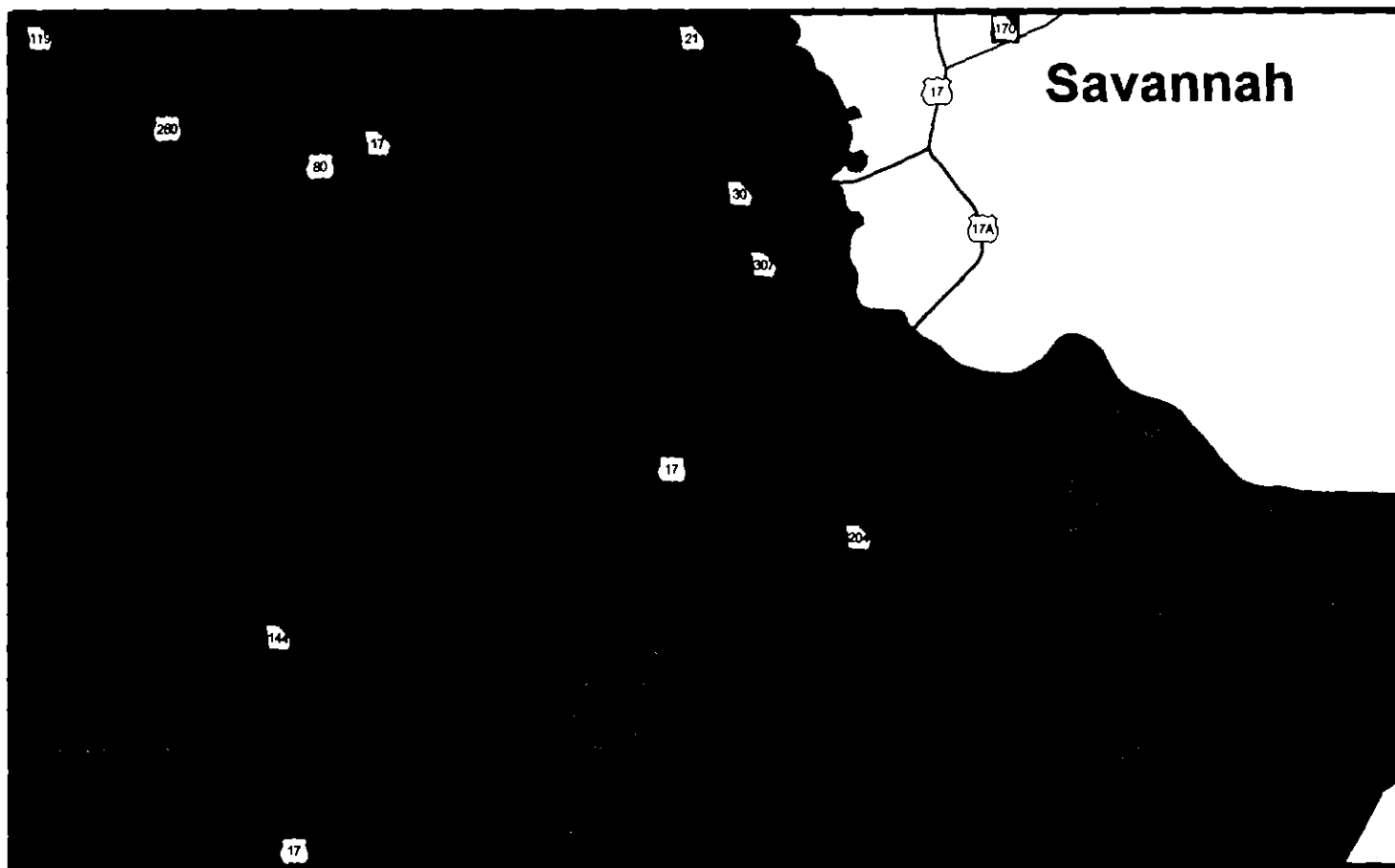
ALL-STATE LEGAL®

EXHIBIT

A







DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
001	629,761	34	0.01%	143,017	22.71%	3,149	146,166	23.21%	25,831	4.10%
VAP	456,300			94,914	20.80%	1,104	96,018	21.04%	16,696	3.66%
002	629,735	8	0.00%	281,832	44.75%	2,933	284,765	45.22%	21,902	3.48%
VAP	455,164			187,367	41.16%	1,314	188,681	41.45%	14,700	3.23%
003	629,748	21	0.00%	251,792	39.98%	2,133	253,925	40.32%	16,140	2.56%
VAP	464,632			173,520	37.35%	947	174,467	37.55%	10,834	2.33%
004	629,690	-37	-0.01%	337,146	53.54%	7,203	344,349	54.69%	53,836	8.55%
VAP	472,785			232,274	49.13%	4,211	236,485	50.02%	40,046	8.47%
005	629,727	0	0.00%	353,540	56.14%	4,908	358,448	56.92%	38,191	6.06%
VAP	492,438			253,078	51.39%	3,204	256,282	52.04%	29,021	5.89%
006	629,725	-2	0.00%	43,856	6.96%	2,484	46,340	7.36%	28,359	4.50%
VAP	455,805			30,186	6.62%	1,144	31,330	6.87%	19,884	4.36%
007	629,706	-21	0.00%	44,474	7.06%	2,292	46,766	7.43%	34,011	5.40%
VAP	444,493			29,384	6.61%	871	30,255	6.81%	22,697	5.11%
008	629,700	-27	0.00%	79,413	12.61%	2,106	81,519	12.95%	13,480	2.14%
VAP	457,971			54,564	11.91%	721	55,285	12.07%	8,973	1.96%
009	629,762	35	0.01%	86,571	13.75%	2,015	88,586	14.07%	16,379	2.60%
VAP	467,232			60,059	12.85%	644	60,703	12.99%	10,599	2.27%
010	629,702	-25	0.00%	21,620	3.43%	1,349	22,969	3.65%	59,240	9.41%
VAP	463,958			15,177	3.27%	412	15,589	3.36%	37,895	8.17%
011	629,730	3	0.00%	179,296	28.47%	3,967	183,263	29.10%	45,433	7.21%
VAP	465,484			121,117	26.02%	1,600	122,717	26.36%	31,026	6.67%
012	629,735	8	0.00%	268,207	42.59%	3,807	272,014	43.19%	18,112	2.88%
VAP	470,201			181,648	38.63%	1,719	183,367	39.00%	12,699	2.70%
013	629,732	5	0.00%	258,778	41.09%	5,537	264,315	41.97%	64,313	10.21%
VAP	450,756			169,697	37.65%	2,602	172,299	38.22%	44,188	9.80%

Total Population: 8,186,453

Ideal Value: 629,727

#### Summary Statistics

Population Range: 629,690 to 629,762

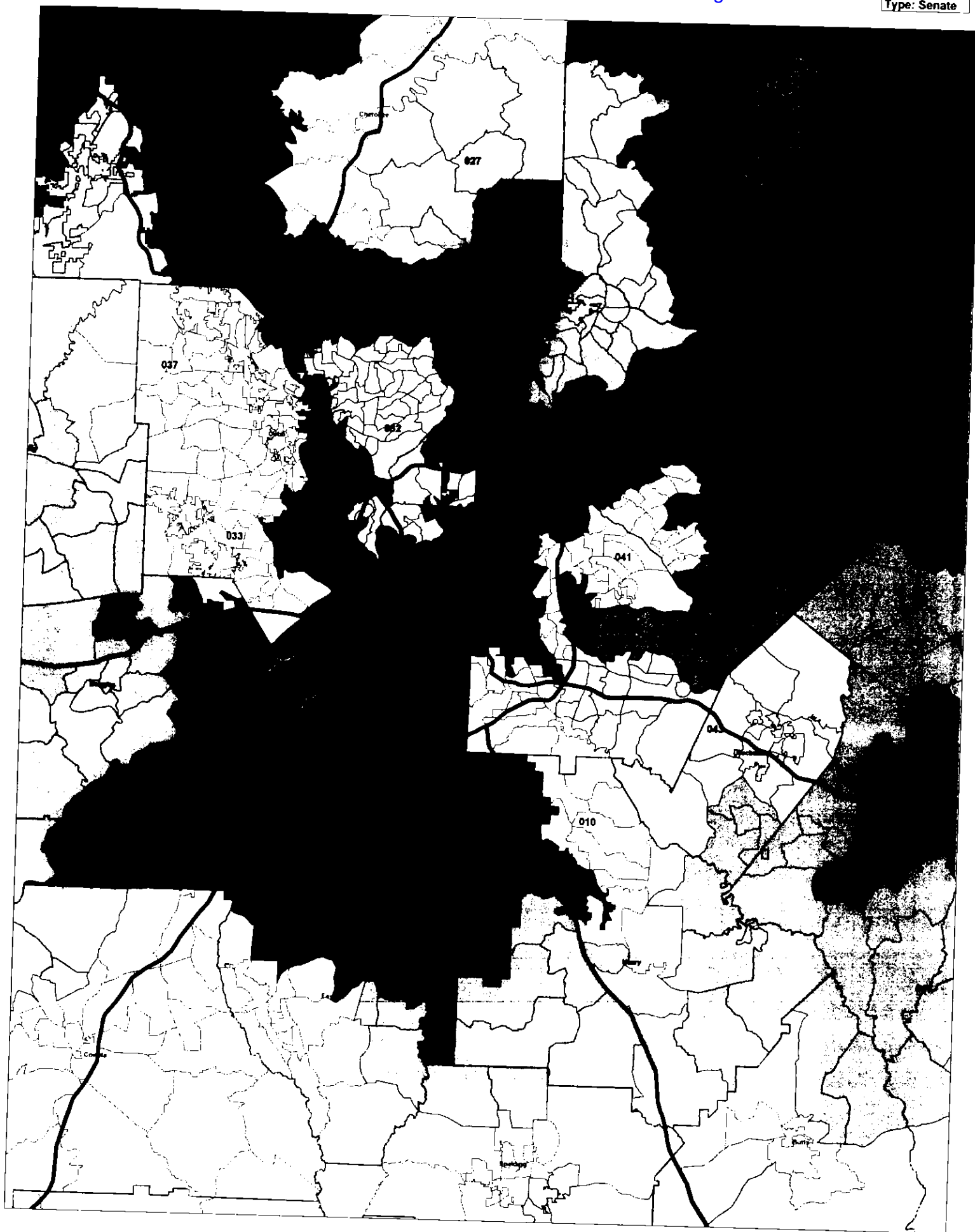
Absolute Range: -37 to 35

Absolute Overall Range: 72

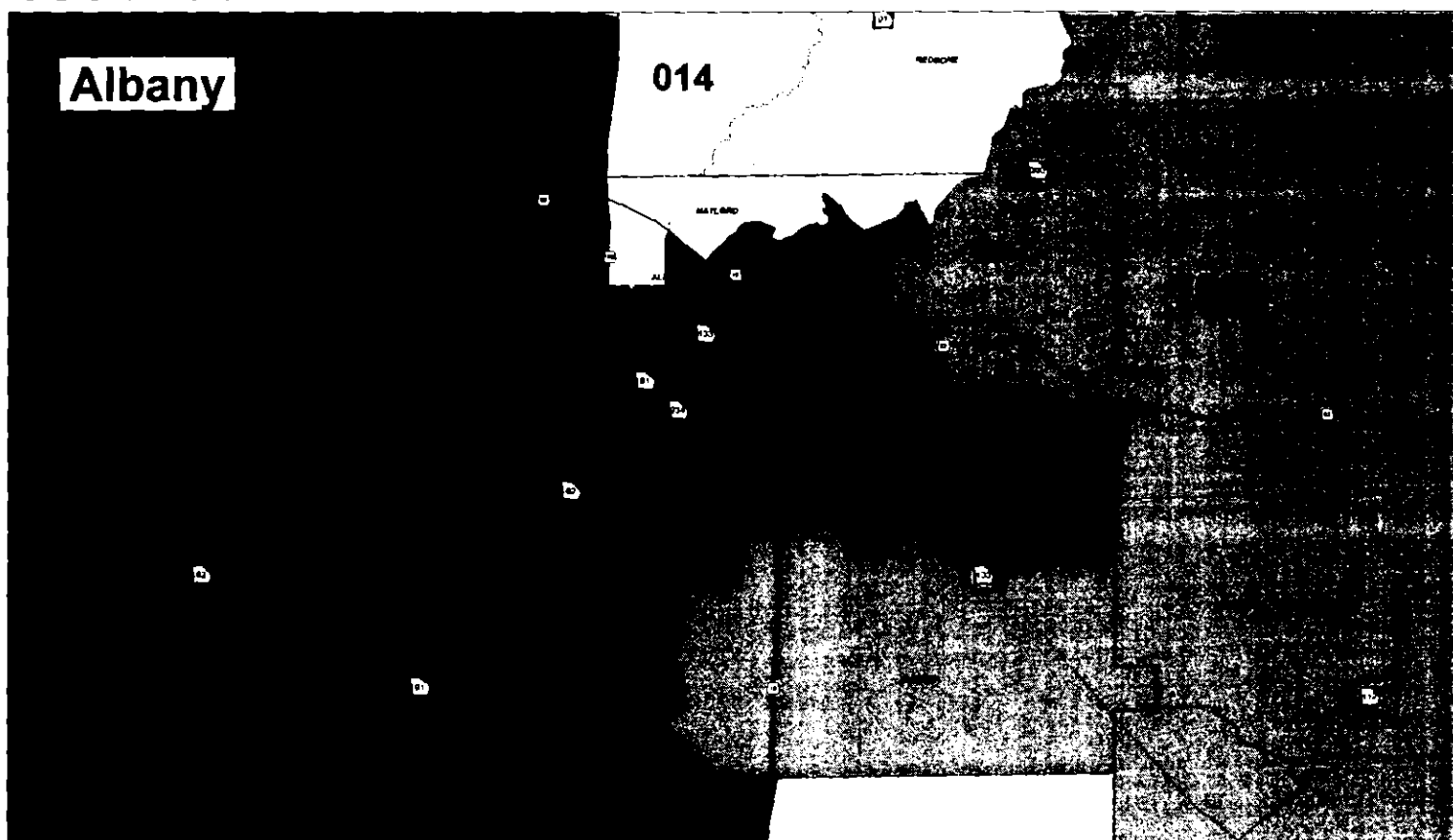
Relative Range: -0.01% to 0.01%

Relative Overall Range: 0.01%







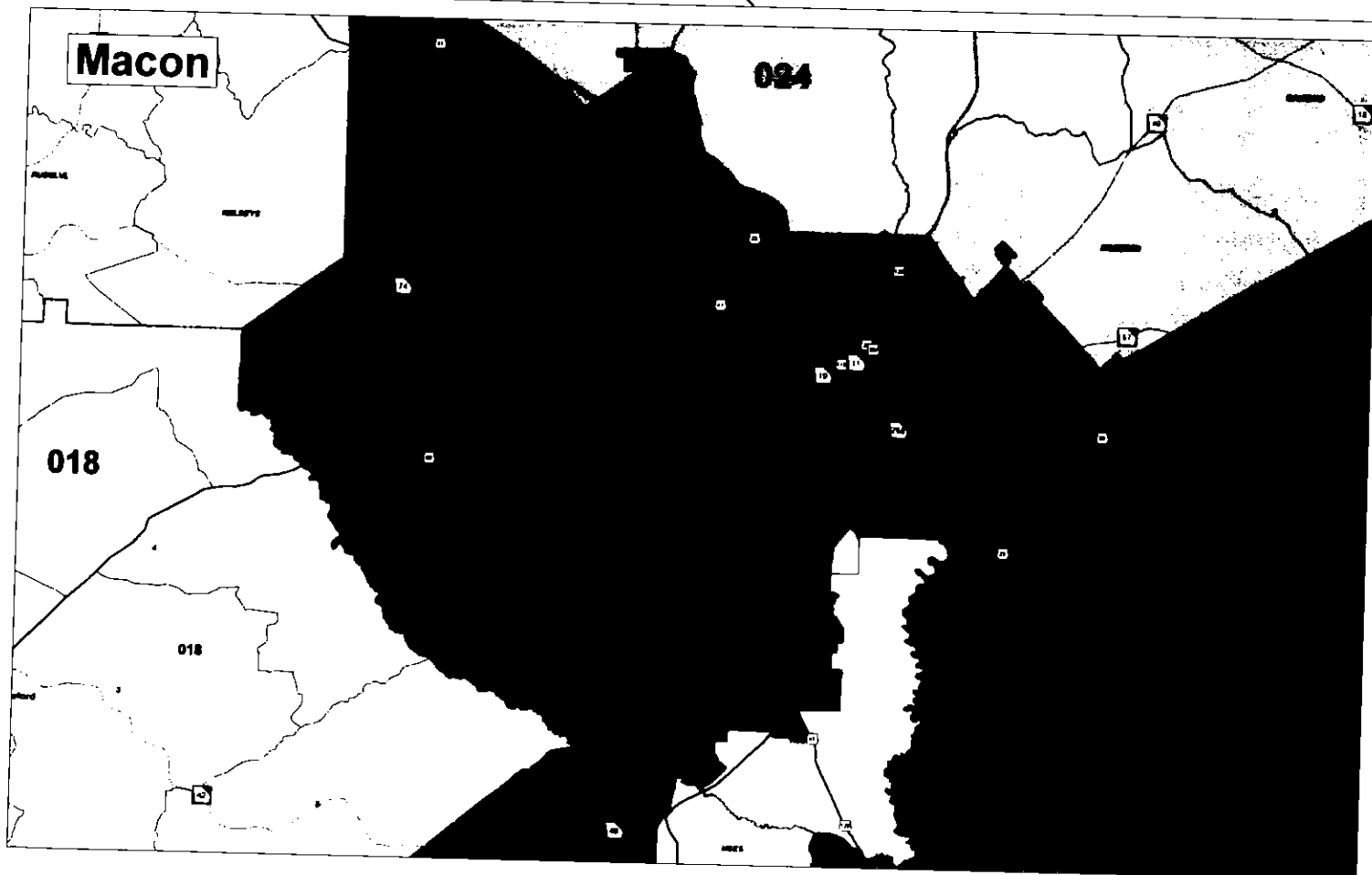
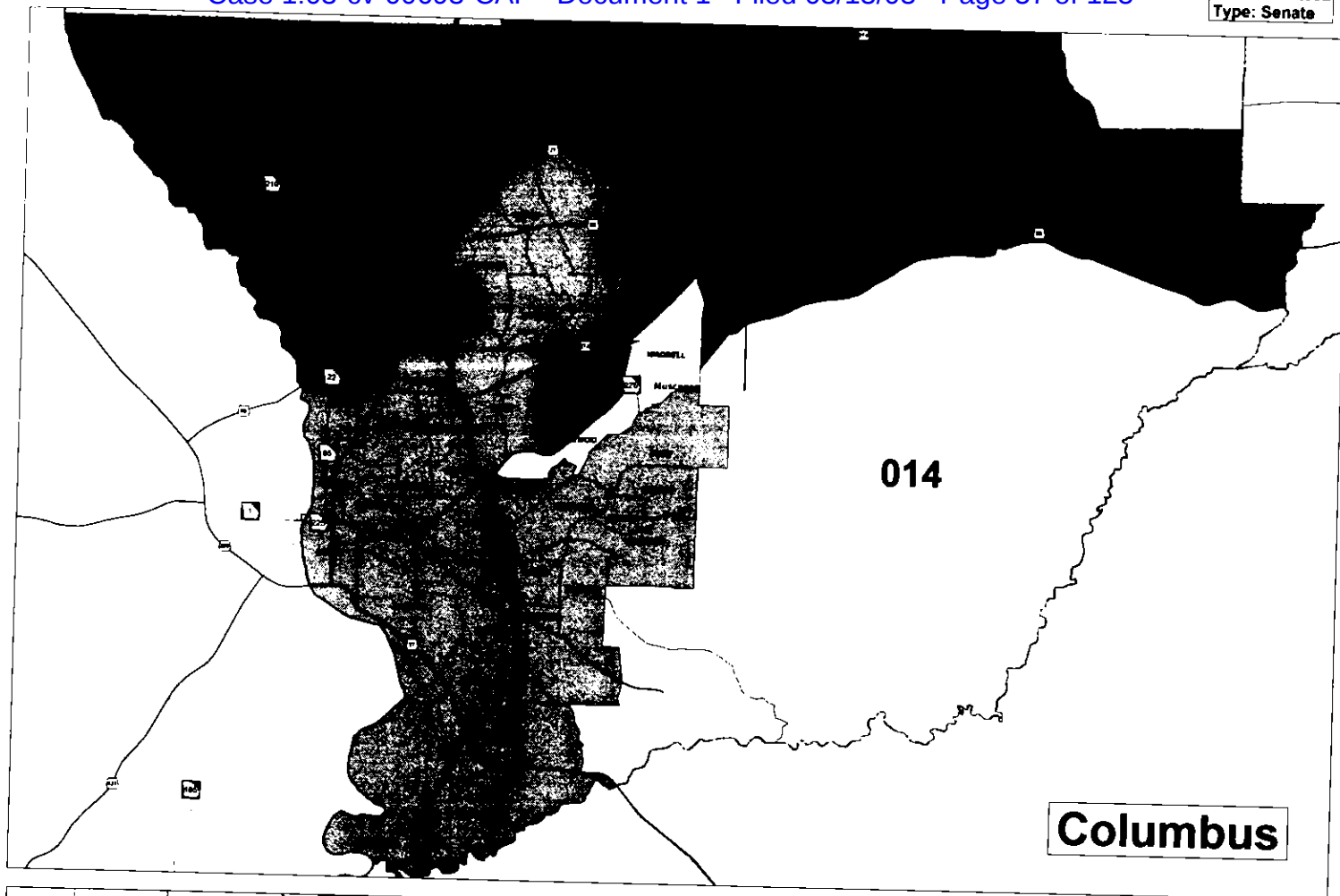




# State of Georgia Senate Districts

Case 1:03-cv-00693-CAP Document 1 Filed 03/13/03 Page 57 of 125

Client: State  
Plan: Senate02  
Type: Senate



Plan Name: Senate02

Plan Type: SENATE

User: staff

Administrator: S026

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
001	148,220	2,033	1.39%	15,378	10.38%	538	15,916	10.74%	3,240	2.19%
VAP	111,963			10,277	9.18%	200	10,477	9.36%	2,121	1.89%
002	141,625	-4,562	-3.12%	83,289	58.81%	932	84,221	59.47%	3,509	2.48%
VAP	104,668			56,556	54.03%	483	57,039	54.50%	2,548	2.43%
003	149,694	3,507	2.40%	53,691	35.87%	1,510	55,201	36.88%	8,660	5.79%
VAP	105,473			35,076	33.26%	497	35,573	33.73%	5,650	5.36%
004	146,340	153	0.10%	39,252	26.82%	410	39,662	27.10%	4,427	3.03%
VAP	108,881			27,961	25.68%	185	28,146	25.85%	2,998	2.75%
005	150,878	4,691	3.21%	39,764	26.36%	1,632	41,396	27.44%	37,581	24.91%
VAP	112,467			27,555	24.50%	866	28,421	25.27%	26,620	23.67%
006	138,894	-7,293	-4.99%	43,088	31.02%	1,454	44,542	32.07%	20,068	14.45%
VAP	109,666			30,392	27.71%	809	31,201	28.45%	14,296	13.04%
007	139,647	-6,540	-4.47%	35,467	25.40%	540	36,007	25.78%	4,954	3.55%
VAP	99,839			23,524	23.56%	194	23,718	23.76%	3,122	3.13%
008	140,221	-5,966	-4.08%	52,466	37.42%	624	53,090	37.86%	3,694	2.63%
VAP	102,603			35,255	34.36%	298	35,553	34.65%	2,477	2.41%
009	153,471	7,284	4.98%	14,098	9.19%	674	14,772	9.63%	9,359	6.10%
VAP	107,166			9,264	8.64%	255	9,519	8.88%	6,119	5.71%
010	138,931	-7,256	-4.96%	90,293	64.99%	946	91,239	65.67%	2,320	1.67%
VAP	97,753			62,194	63.62%	505	62,699	64.14%	1,484	1.52%
011	140,910	-5,277	-3.61%	47,670	33.83%	412	48,082	34.12%	4,918	3.49%
VAP	102,081			30,762	30.13%	191	30,953	30.32%	3,149	3.08%
012	140,124	-6,063	-4.15%	81,696	58.30%	494	82,190	58.66%	2,076	1.48%
VAP	101,307			55,516	54.80%	247	55,763	55.04%	1,401	1.38%
013	139,312	-6,875	-4.70%	41,347	29.68%	337	41,684	29.92%	6,694	4.81%
VAP	101,820			27,034	26.55%	137	27,171	26.69%	4,551	4.47%
014	140,316	-5,871	-4.02%	54,992	39.19%	717	55,709	39.70%	5,044	3.59%
VAP	103,408			37,598	36.36%	340	37,938	36.69%	3,565	3.45%
015	139,366	-6,821	-4.67%	75,002	53.82%	1,397	76,399	54.82%	6,338	4.55%
VAP	100,216			50,430	50.32%	545	50,975	50.87%	4,227	4.22%
016	153,456	7,269	4.97%	18,609	12.13%	495	19,104	12.45%	3,339	2.18%
VAP	112,494			12,800	11.38%	158	12,958	11.52%	2,222	1.98%
017	153,451	7,264	4.97%	12,860	8.38%	377	13,237	8.63%	2,697	1.76%
VAP	110,552			8,579	7.76%	113	8,692	7.86%	1,710	1.55%
018	146,068	-119	-0.08%	47,570	32.57%	469	48,039	32.89%	3,407	2.33%
VAP	108,424			33,548	30.94%	195	33,743	31.12%	2,349	2.17%
019	139,123	-7,064	-4.83%	31,658	22.76%	353	32,011	23.01%	8,092	5.82%
VAP	100,940			21,384	21.18%	139	21,523	21.32%	5,087	5.04%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
020	139,005	-7,182	-4.91%	49,097	35.32%	320	49,417	35.55%	2,544	1.83%
VAP	101,996			33,154	32.51%	142	33,296	32.64%	1,692	1.66%
021	153,466	7,279	4.98%	7,916	5.16%	530	8,446	5.50%	7,189	4.68%
VAP	109,243			5,321	4.87%	219	5,540	5.07%	4,831	4.42%
022	139,090	-7,097	-4.85%	76,123	54.73%	1,330	77,453	55.69%	3,305	2.38%
VAP	99,502			50,711	50.96%	538	51,249	51.51%	2,154	2.16%
023	139,083	-7,104	-4.86%	57,747	41.52%	864	58,611	42.14%	4,322	3.11%
VAP	102,170			38,614	37.79%	362	38,976	38.15%	3,065	3.00%
024	152,396	6,209	4.25%	20,961	13.75%	526	21,487	14.10%	2,910	1.91%
VAP	110,060			14,742	13.39%	168	14,910	13.55%	1,868	1.70%
025	147,330	1,143	0.78%	59,174	40.16%	575	59,749	40.55%	2,601	1.77%
VAP	110,172			41,339	37.52%	252	41,591	37.75%	1,763	1.60%
026	139,764	-6,423	-4.39%	83,545	59.78%	765	84,310	60.32%	2,350	1.68%
VAP	101,010			55,685	55.13%	328	56,013	55.45%	1,600	1.58%
027	152,891	6,704	4.59%	5,425	3.55%	396	5,821	3.81%	6,090	3.98%
VAP	105,320			3,630	3.45%	165	3,795	3.60%	4,116	3.91%
028	153,459	7,272	4.97%	15,842	10.32%	409	16,251	10.59%	4,130	2.69%
VAP	108,985			10,458	9.60%	135	10,593	9.72%	2,854	2.62%
029	144,766	-1,421	-0.97%	56,889	39.30%	524	57,413	39.66%	2,624	1.81%
VAP	104,105			38,175	36.67%	201	38,376	36.86%	1,886	1.81%
030	153,363	7,176	4.91%	16,155	10.53%	589	16,744	10.92%	2,613	1.70%
VAP	109,366			10,481	9.58%	176	10,657	9.74%	1,676	1.53%
031	144,176	-2,011	-1.38%	19,820	13.75%	571	20,391	14.14%	6,351	4.41%
VAP	106,872			13,785	12.90%	148	13,933	13.04%	4,239	3.97%
032	153,292	7,105	4.86%	8,584	5.60%	523	9,107	5.94%	5,218	3.40%
VAP	116,205			6,251	5.38%	256	6,507	5.60%	3,712	3.19%
033	138,915	-7,272	-4.97%	48,188	34.69%	1,240	49,428	35.58%	15,113	10.88%
VAP	101,319			31,864	31.45%	539	32,403	31.98%	10,071	9.94%
034	143,538	-2,649	-1.81%	76,124	53.03%	1,578	77,702	54.13%	5,560	3.87%
VAP	100,130			49,814	49.75%	795	50,609	50.54%	3,560	3.56%
035	143,613	-2,574	-1.76%	90,178	62.79%	1,333	91,511	63.72%	7,141	4.97%
VAP	102,621			61,584	60.01%	696	62,280	60.69%	4,677	4.56%
036	139,270	-6,917	-4.73%	86,537	62.14%	1,115	87,652	62.94%	10,459	7.51%
VAP	105,218			59,194	56.26%	720	59,914	56.94%	8,071	7.67%
037	151,057	4,870	3.33%	12,882	8.53%	583	13,465	8.91%	5,448	3.61%
VAP	106,260			8,593	8.09%	255	8,848	8.33%	3,602	3.39%
038	139,233	-6,954	-4.76%	88,861	63.82%	863	89,724	64.44%	7,963	5.72%
VAP	104,463			62,389	59.72%	591	62,980	60.29%	6,042	5.78%
039	138,909	-7,278	-4.98%	83,621	60.20%	973	84,594	60.90%	4,569	3.29%
VAP	113,462			63,469	55.94%	680	64,149	56.54%	3,573	3.15%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
040	153,269	7,082	4.84%	48,484	31.63%	1,174	49,658	32.40%	21,271	13.88%
VAP	120,669			35,087	29.08%	724	35,811	29.68%	15,974	13.24%
041	150,406	4,219	2.89%	60,797	40.42%	1,869	62,666	41.66%	9,686	6.44%
VAP	112,282			41,295	36.78%	980	42,275	37.65%	6,691	5.96%
042	152,967	6,780	4.64%	20,025	13.09%	1,087	21,112	13.80%	24,103	15.76%
VAP	128,002			15,433	12.06%	746	16,179	12.64%	18,506	14.46%
043	139,178	-7,009	-4.79%	90,440	64.98%	1,319	91,759	65.93%	5,276	3.79%
VAP	98,010			60,680	61.91%	703	61,383	62.63%	3,702	3.78%
044	149,248	3,061	2.09%	57,107	38.26%	1,398	58,505	39.20%	13,859	9.29%
VAP	106,379			36,341	34.16%	586	36,927	34.71%	9,372	8.81%
045	153,446	7,259	4.97%	7,295	4.75%	422	7,717	5.03%	6,156	4.01%
VAP	108,990			5,047	4.63%	123	5,170	4.74%	4,044	3.71%
046	144,159	-2,028	-1.39%	32,448	22.51%	652	33,100	22.96%	7,917	5.49%
VAP	113,573			22,471	19.79%	306	22,777	20.05%	5,481	4.83%
047	145,582	-605	-0.41%	36,156	24.84%	378	36,534	25.10%	2,636	1.81%
VAP	108,686			25,325	23.30%	124	25,449	23.42%	1,717	1.58%
048	153,195	7,008	4.79%	11,509	7.51%	618	12,127	7.92%	10,861	7.09%
VAP	110,094			7,926	7.20%	252	8,178	7.43%	7,492	6.81%
049	152,919	6,732	4.61%	4,937	3.23%	280	5,217	3.41%	11,170	7.30%
VAP	112,545			3,435	3.05%	77	3,512	3.12%	7,081	6.29%
050	142,999	-3,188	-2.18%	11,547	8.07%	357	11,904	8.32%	20,445	14.30%
VAP	108,455			8,191	7.55%	134	8,325	7.68%	13,216	12.19%
051	153,489	7,302	4.99%	2,938	1.91%	230	3,168	2.06%	6,776	4.41%
VAP	116,137			2,013	1.73%	83	2,096	1.80%	4,561	3.93%
052	150,070	3,883	2.66%	17,413	11.60%	510	17,923	11.94%	12,389	8.26%
VAP	112,820			12,413	11.00%	125	12,538	11.11%	7,971	7.07%
053	153,459	7,272	4.97%	3,303	2.15%	361	3,664	2.39%	6,380	4.16%
VAP	114,267			2,284	2.00%	77	2,361	2.07%	4,022	3.52%
054	153,033	6,846	4.68%	5,083	3.32%	378	5,461	3.57%	12,783	8.35%
VAP	110,785			3,507	3.17%	92	3,599	3.25%	8,111	7.32%
055	138,924	-7,263	-4.97%	86,109	61.98%	2,225	88,334	63.58%	4,657	3.35%
VAP	97,091			57,626	59.35%	1,251	58,877	60.64%	3,156	3.25%
056	153,447	7,260	4.97%	12,092	7.88%	707	12,799	8.34%	9,945	6.48%
VAP	118,234			8,953	7.57%	387	9,340	7.90%	7,413	6.27%

Total Population: 8,186,453

Ideal Value: 146,187

**Summary Statistics**

Population Range: 138,894 to 153,489

Absolute Range: -7,293 to 7,302

Absolute Overall Range: 14,595

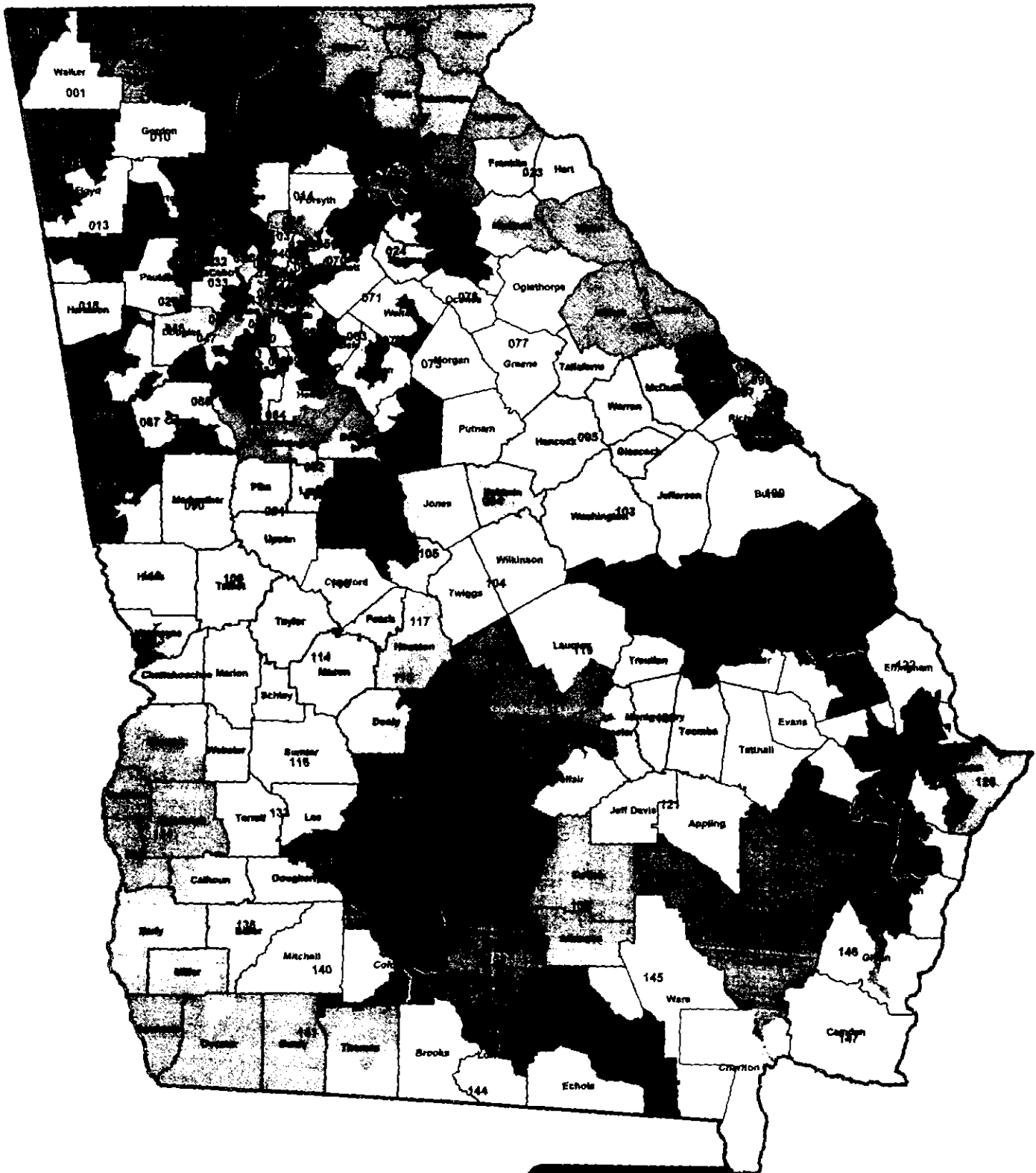
Relative Range: -4.99% to 4.99%

Relative Overall Range: 9.98%

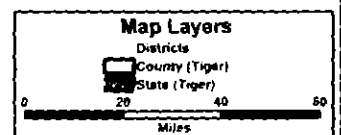
DATA SOURCE: 2000 US Census PL94-171 Population Counts

# State of Georgia House Districts

Client: State  
Plan: House02  
Type: House

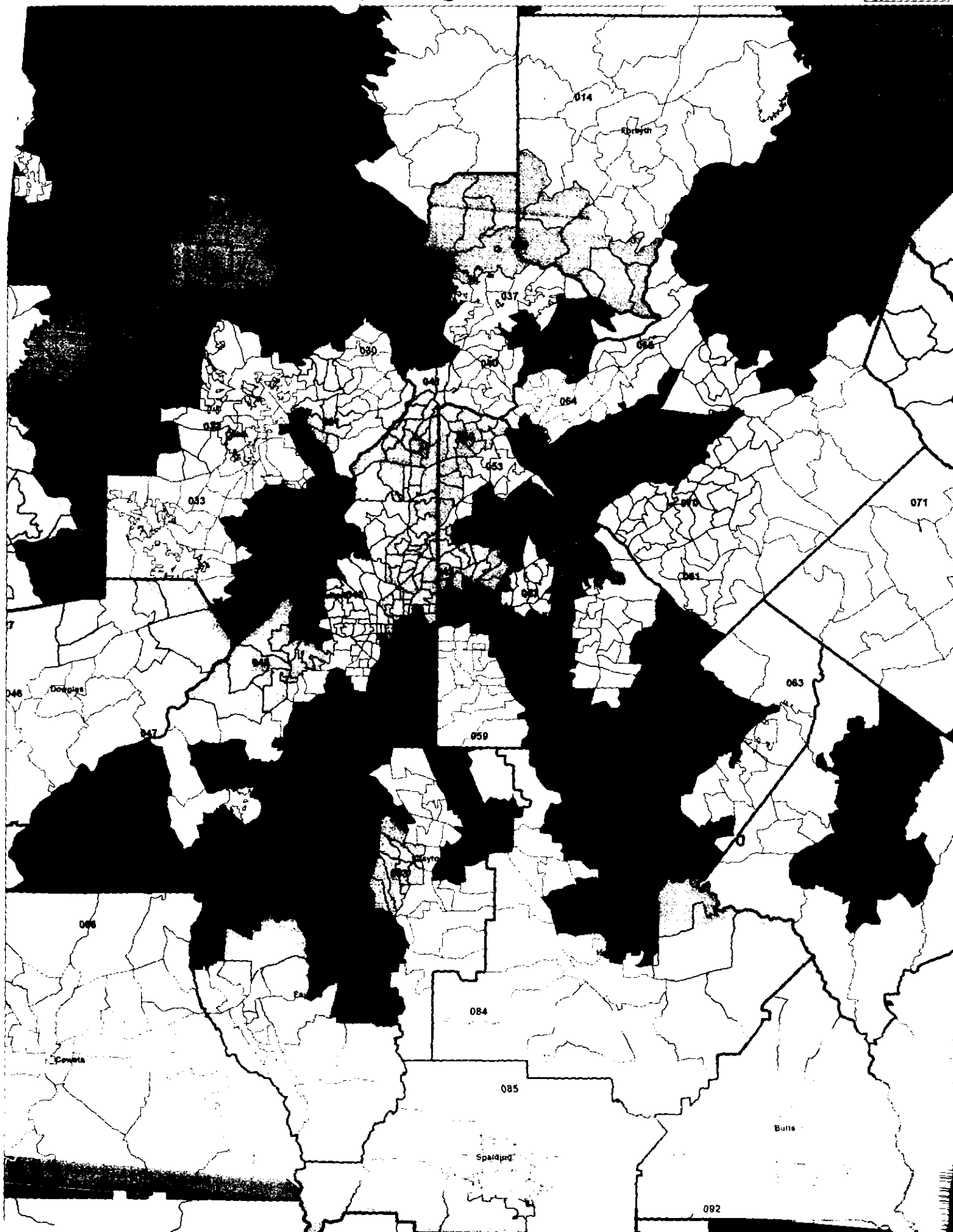


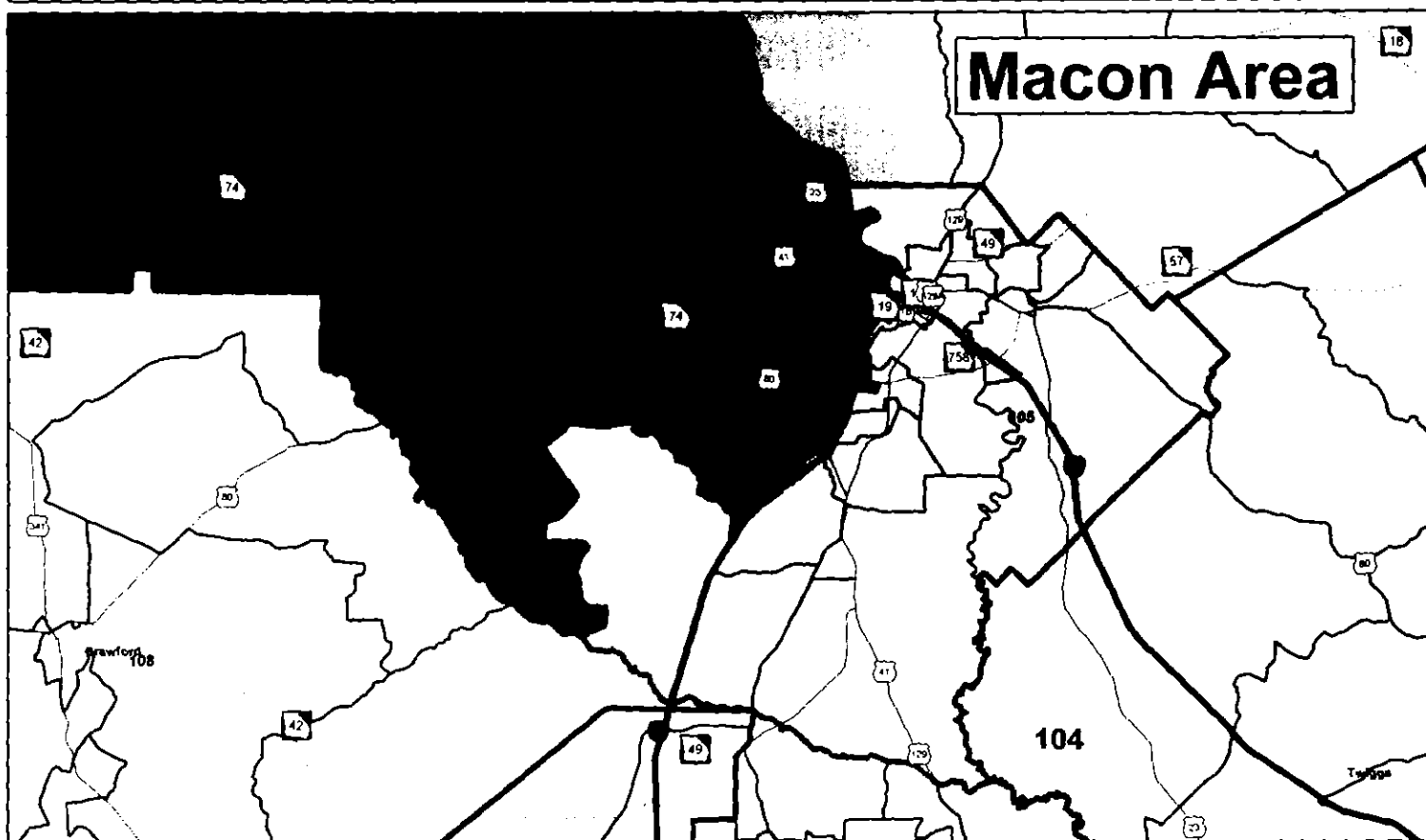
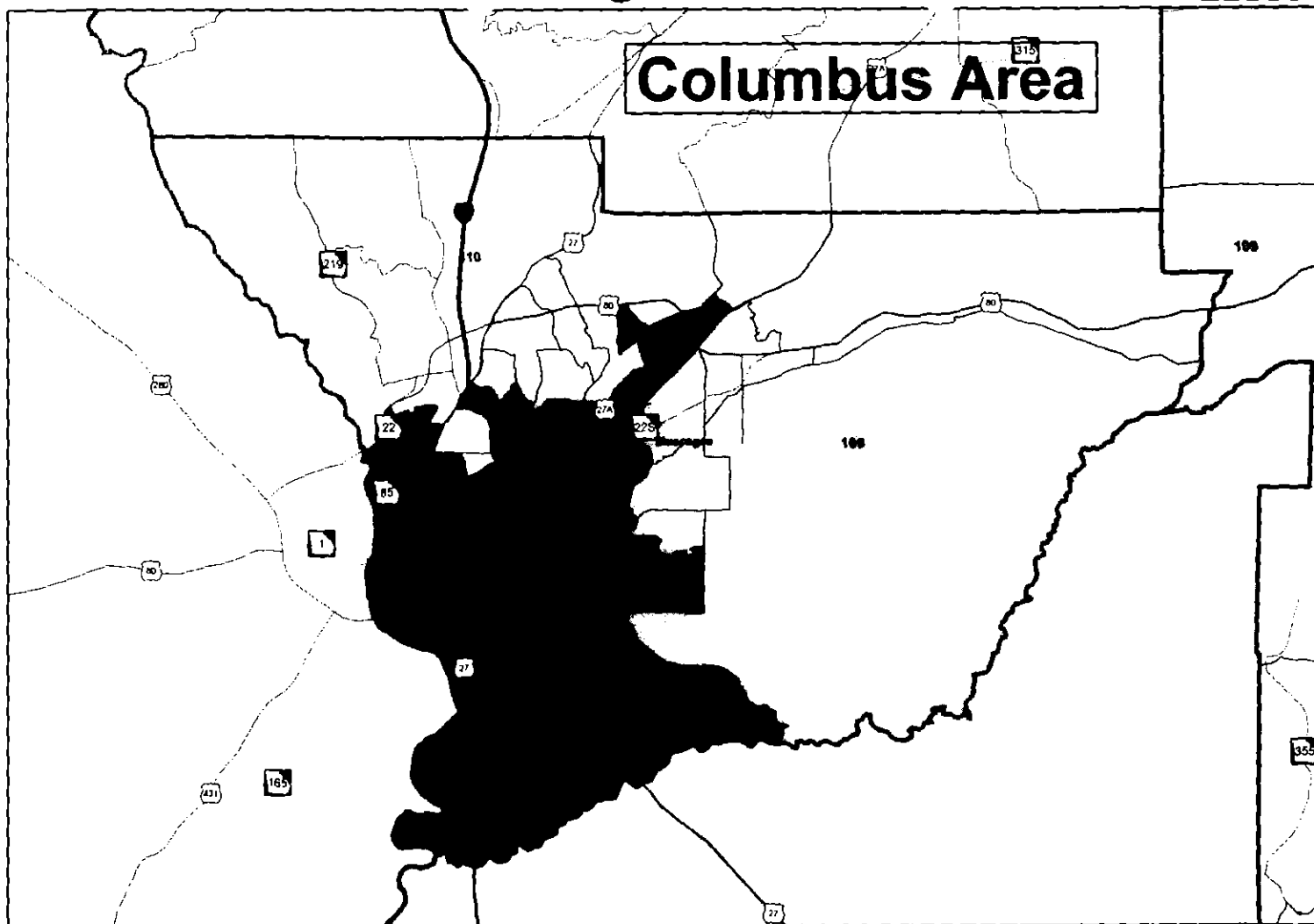
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# State of Georgia House Districts

Client: State  
Plan: House02  
Type: House

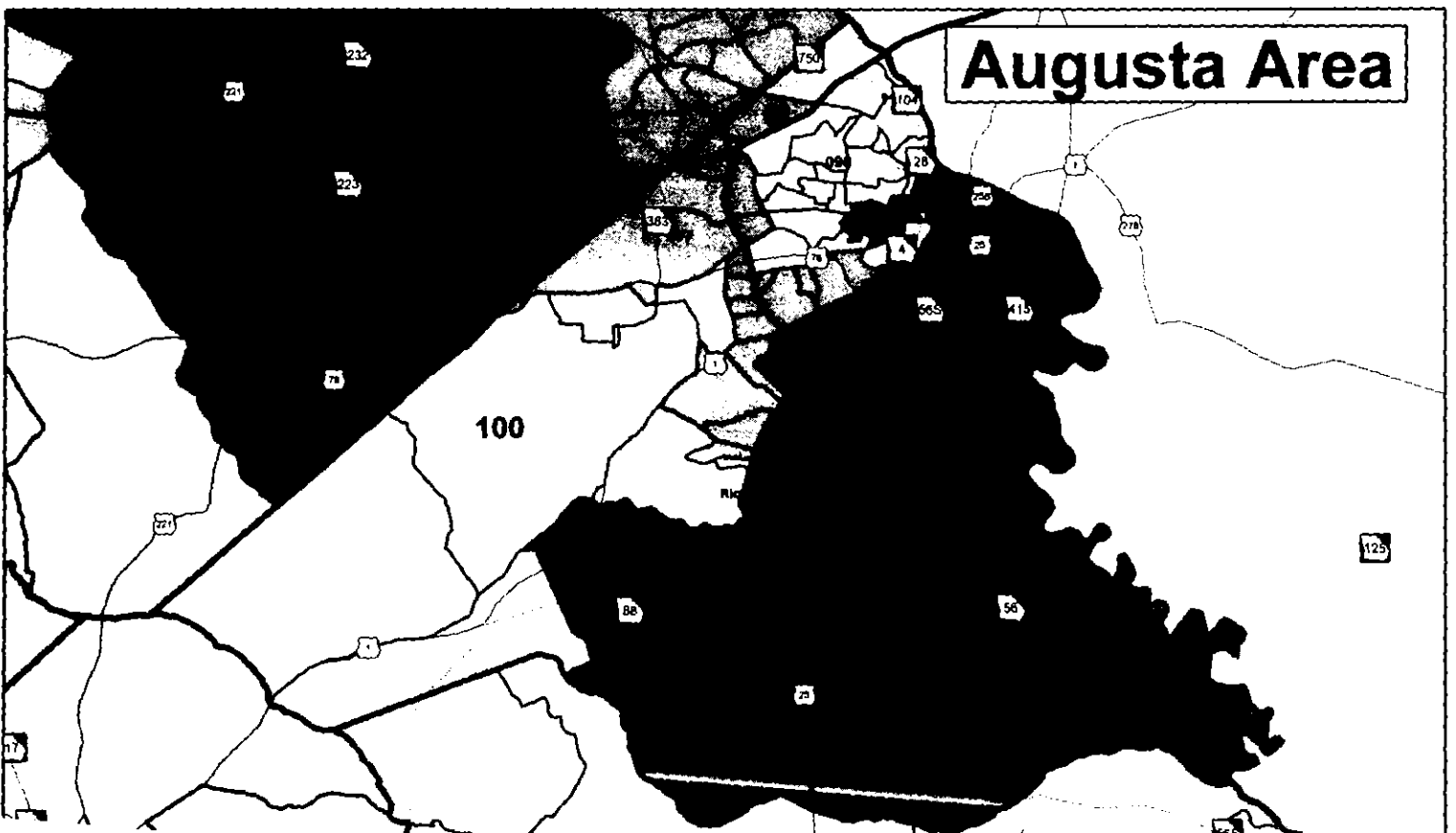
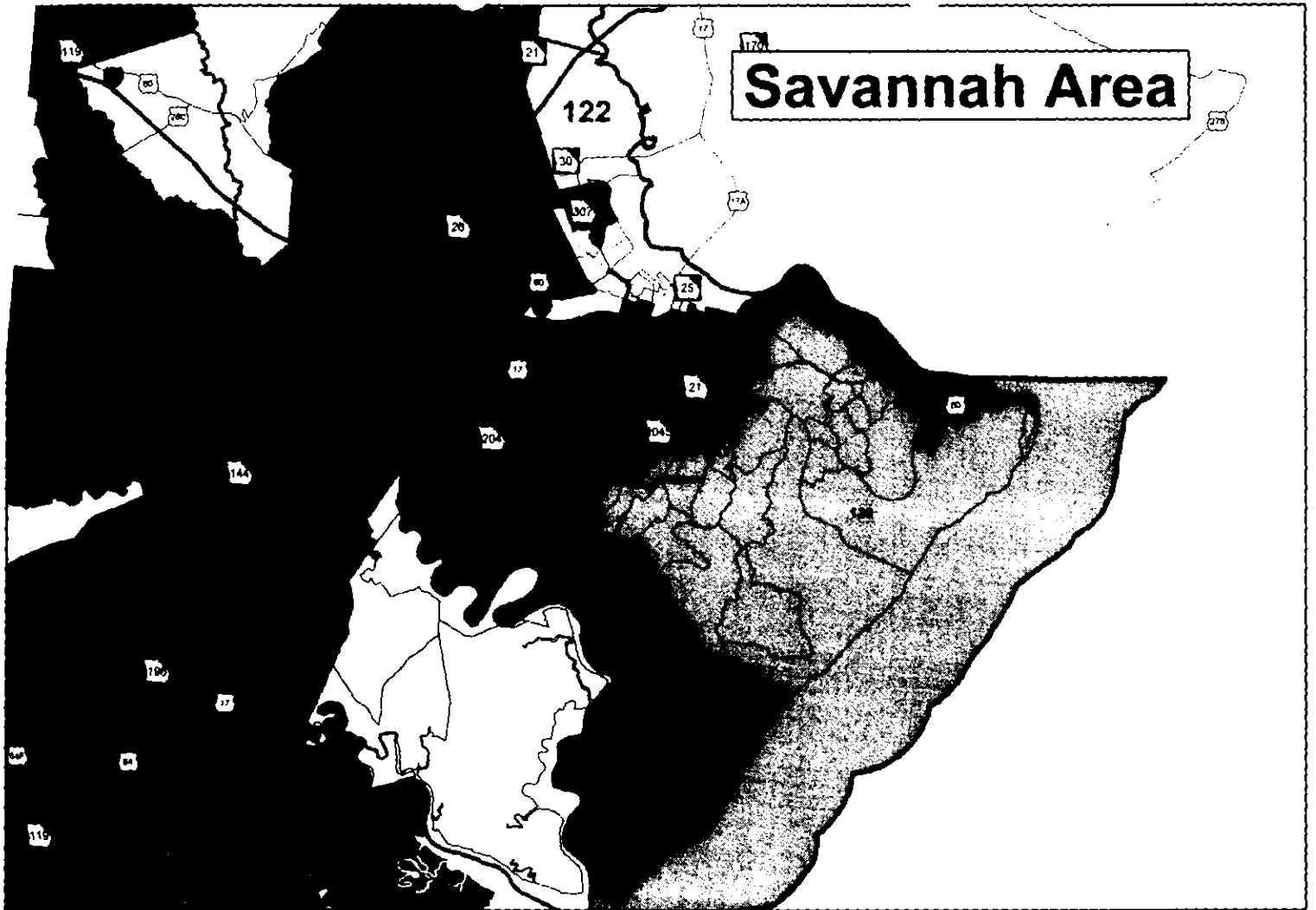






# State of Georgia House Districts

Client: State  
Plan: House02  
Type: House





Plan Name: **House02**Plan Type: **House**

User:

Administrator: **H169**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
001	43,994	-1,486	-3.27%	1,969	4.48%	114	2,083	4.73%	389	0.88%
VAP	33,197			1,422	4.28%	18	1,440	4.34%	254	0.77%
002	46,960	1,480	3.25%	534	1.14%	61	595	1.27%	478	1.02%
VAP	35,466			381	1.07%	13	394	1.11%	315	0.89%
003	95,270	4,310	4.74%	1,119	1.17%	146	1,265	1.33%	2,875	3.02%
VAP	70,779			756	1.07%	29	785	1.11%	1,781	2.52%
004	47,717	2,237	4.92%	1,473	3.09%	162	1,635	3.43%	10,503	22.01%
VAP	35,058			1,009	2.88%	49	1,058	3.02%	6,525	18.61%
005	46,330	850	1.87%	1,485	3.21%	149	1,634	3.53%	8,875	19.16%
VAP	33,122			1,069	3.23%	47	1,116	3.37%	5,498	16.60%
006	47,209	1,729	3.80%	355	0.75%	39	394	0.83%	1,228	2.60%
VAP	36,169			249	0.69%	13	262	0.72%	810	2.24%
007	47,366	1,886	4.15%	1,058	2.23%	108	1,166	2.46%	2,807	5.93%
VAP	36,080			804	2.23%	44	848	2.35%	1,758	4.87%
008	45,685	205	0.45%	353	0.77%	46	399	0.87%	951	2.08%
VAP	36,645			265	0.72%	16	281	0.77%	672	1.83%
009	47,698	2,218	4.88%	1,914	4.01%	103	2,017	4.23%	3,858	8.09%
VAP	35,536			1,451	4.08%	33	1,484	4.18%	2,452	6.90%
010	44,104	-1,376	-3.03%	1,527	3.46%	106	1,633	3.70%	3,268	7.41%
VAP	32,606			1,077	3.30%	27	1,104	3.39%	2,318	7.11%
011	45,402	-78	-0.17%	3,602	7.93%	138	3,740	8.24%	1,148	2.53%
VAP	34,609			2,831	8.18%	30	2,861	8.27%	798	2.31%
012	47,360	1,880	4.13%	2,680	5.66%	125	2,805	5.92%	1,070	2.26%
VAP	34,169			1,856	5.43%	26	1,882	5.51%	681	1.99%
013	94,588	3,628	3.99%	14,805	15.65%	350	15,155	16.02%	5,772	6.10%
VAP	70,733			10,090	14.26%	85	10,175	14.39%	3,794	5.36%
014	95,034	4,074	4.48%	527	0.55%	77	604	0.64%	4,384	4.61%
VAP	69,793			369	0.53%	35	404	0.58%	3,044	4.36%
015	47,248	1,768	3.89%	1,422	3.01%	137	1,559	3.30%	2,732	5.78%
VAP	32,807			919	2.80%	45	964	2.94%	1,836	5.60%
016	47,654	2,174	4.78%	1,105	2.32%	93	1,198	2.51%	3,213	6.74%
VAP	34,691			757	2.18%	30	787	2.27%	2,265	6.53%
017	47,674	2,194	4.82%	1,561	3.27%	123	1,684	3.53%	1,859	3.90%
VAP	33,767			1,071	3.17%	50	1,121	3.32%	1,248	3.70%
018	43,482	-1,998	-4.39%	2,196	5.05%	101	2,297	5.28%	382	0.88%
VAP	31,820			1,523	4.79%	32	1,555	4.89%	243	0.76%
019	43,307	-2,173	-4.78%	5,396	12.46%	134	5,530	12.77%	2,950	6.81%
VAP	31,849			3,700	11.62%	36	3,736	11.73%	1,888	5.93%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
020	47,642	2,162	4.75%	6,886	14.45%	160	7,046	14.79%	17,414	36.55%
VAP	34,893			4,804	13.77%	78	4,882	13.99%	11,220	32.16%
021	47,412	1,932	4.25%	1,946	4.10%	110	2,056	4.34%	6,094	12.85%
VAP	35,108			1,352	3.85%	36	1,388	3.95%	3,850	10.97%
022	43,324	-2,156	-4.74%	3,743	8.64%	115	3,858	8.90%	787	1.82%
VAP	32,785			2,619	7.99%	30	2,649	8.08%	504	1.54%
023	44,230	-1,250	-2.75%	6,094	13.78%	106	6,200	14.02%	417	0.94%
VAP	33,632			4,281	12.73%	26	4,307	12.81%	281	0.84%
024	44,498	-982	-2.16%	2,159	4.85%	120	2,279	5.12%	1,498	3.37%
VAP	31,917			1,475	4.62%	33	1,508	4.72%	987	3.09%
025	43,235	-2,245	-4.94%	5,558	12.86%	194	5,752	13.30%	1,211	2.80%
VAP	31,620			3,989	12.62%	41	4,030	12.75%	767	2.43%
026	47,741	2,261	4.97%	3,288	6.89%	129	3,417	7.16%	1,002	2.10%
VAP	33,180			2,128	6.41%	40	2,168	6.53%	630	1.90%
027	46,907	1,427	3.14%	7,840	16.71%	335	8,175	17.43%	1,215	2.59%
VAP	32,621			5,016	15.38%	82	5,098	15.63%	717	2.20%
028	47,745	2,265	4.98%	2,431	5.09%	107	2,538	5.32%	1,015	2.13%
VAP	31,985			1,558	4.87%	41	1,599	5.00%	621	1.94%
029	47,615	2,135	4.69%	3,407	7.16%	235	3,642	7.65%	2,018	4.24%
VAP	34,125			2,248	6.59%	103	2,351	6.89%	1,320	3.87%
030	47,558	2,078	4.57%	1,618	3.40%	119	1,737	3.65%	1,069	2.25%
VAP	33,756			1,138	3.37%	51	1,189	3.52%	702	2.08%
031	47,458	1,978	4.35%	2,938	6.19%	172	3,110	6.55%	1,493	3.15%
VAP	36,173			2,074	5.73%	80	2,154	5.95%	1,081	2.99%
032	47,646	2,166	4.76%	5,201	10.92%	198	5,399	11.33%	3,077	6.46%
VAP	35,872			3,622	10.10%	109	3,731	10.40%	2,232	6.22%
033	136,143	-297	-0.22%	43,369	31.86%	1,279	44,648	32.79%	17,679	12.99%
VAP	100,365			28,508	28.40%	550	29,058	28.95%	11,979	11.94%
034	130,408	-6,032	-4.42%	42,713	32.75%	1,400	44,113	33.83%	16,814	12.89%
VAP	102,768			30,009	29.20%	784	30,793	29.96%	11,919	11.60%
035	47,747	2,267	4.98%	5,471	11.46%	298	5,769	12.08%	2,368	4.96%
VAP	33,664			3,610	10.72%	125	3,735	11.09%	1,544	4.59%
036	46,854	1,374	3.02%	2,831	6.04%	218	3,049	6.51%	1,562	3.33%
VAP	31,285			1,865	5.96%	92	1,957	6.26%	1,029	3.29%
037	47,471	1,991	4.38%	3,557	7.49%	231	3,788	7.98%	5,017	10.57%
VAP	34,343			2,548	7.42%	120	2,668	7.77%	3,772	10.98%
038	47,447	1,967	4.32%	886	1.87%	55	941	1.98%	1,985	4.18%
VAP	32,977			626	1.90%	26	652	1.98%	1,356	4.11%
039	47,549	2,069	4.55%	2,608	5.48%	164	2,772	5.83%	2,695	5.67%
VAP	35,495			1,816	5.12%	80	1,896	5.34%	1,951	5.50%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP.
040	47,378	1,898	4.17%	4,231	8.93%	278	4,509	9.52%	4,183	8.83%
VAP	35,439			2,952	8.33%	154	3,106	8.76%	3,114	8.79%
041	47,726	2,246	4.94%	7,075	14.82%	346	7,421	15.55%	2,962	6.21%
VAP	38,856			5,418	13.94%	225	5,643	14.52%	2,214	5.70%
042	175,212	-6,708	-3.69%	20,058	11.45%	898	20,956	11.96%	17,634	10.06%
VAP	153,771			17,101	11.12%	680	17,781	11.56%	14,041	9.13%
043	95,322	4,362	4.80%	63,574	66.69%	634	64,208	67.36%	2,465	2.59%
VAP	72,978			47,135	64.59%	435	47,570	65.18%	1,822	2.50%
044	45,173	-307	-0.68%	28,953	64.09%	233	29,186	64.61%	1,990	4.41%
VAP	33,002			19,375	58.71%	155	19,530	59.18%	1,507	4.57%
045	46,102	622	1.37%	29,793	64.62%	287	30,080	65.25%	903	1.96%
VAP	34,199			21,909	64.06%	166	22,075	64.55%	579	1.69%
046	47,407	1,927	4.24%	6,410	13.52%	218	6,628	13.98%	1,111	2.34%
VAP	34,123			4,074	11.94%	80	4,154	12.17%	724	2.12%
047	46,491	1,011	2.22%	27,936	60.09%	322	28,258	60.78%	975	2.10%
VAP	33,511			19,954	59.54%	192	20,146	60.12%	641	1.91%
048	176,939	-4,981	-2.74%	111,811	63.19%	1,492	113,303	64.04%	8,095	4.58%
VAP	126,761			76,659	60.48%	833	77,492	61.13%	5,293	4.18%
049	43,209	-2,271	-4.99%	35,649	82.50%	406	36,055	83.44%	2,136	4.94%
VAP	31,599			25,306	80.08%	251	25,557	80.88%	1,643	5.20%
050	43,211	-2,269	-4.99%	30,085	69.62%	346	30,431	70.42%	4,354	10.08%
VAP	28,469			18,450	64.81%	164	18,614	65.38%	3,015	10.59%
051	43,675	-1,805	-3.97%	24,806	56.80%	356	25,162	57.61%	3,196	7.32%
VAP	34,793			17,862	51.34%	256	18,118	52.07%	2,428	6.98%
052	46,391	911	2.00%	3,776	8.14%	191	3,967	8.55%	1,571	3.39%
VAP	37,608			2,892	7.69%	144	3,036	8.07%	1,230	3.27%
053	45,658	178	0.39%	9,682	21.21%	419	10,101	22.12%	12,014	26.31%
VAP	36,985			7,210	19.49%	243	7,453	20.15%	8,982	24.29%
054	45,406	-74	-0.16%	7,221	15.90%	481	7,702	16.96%	18,737	41.27%
VAP	36,076			5,590	15.50%	339	5,929	16.43%	14,244	39.48%
055	43,458	-2,022	-4.45%	28,488	65.55%	634	29,122	67.01%	2,259	5.20%
VAP	31,590			19,341	61.23%	340	19,681	62.30%	1,586	5.02%
056	86,447	-4,513	-4.96%	11,729	13.57%	494	12,223	14.14%	4,434	5.13%
VAP	71,669			8,458	11.80%	259	8,717	12.16%	3,381	4.72%
057	43,253	-2,227	-4.90%	25,992	60.09%	1,518	27,510	63.60%	1,704	3.94%
VAP	31,029			17,589	56.69%	900	18,489	59.59%	1,181	3.81%
058	43,458	-2,022	-4.45%	35,179	80.95%	406	35,585	81.88%	1,023	2.35%
VAP	31,254			24,355	77.93%	235	24,590	78.68%	699	2.24%
059	130,785	-5,655	-4.14%	82,123	62.79%	927	83,050	63.50%	2,984	2.28%
VAP	93,169			57,141	61.33%	492	57,633	61.86%	2,024	2.17%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
060	130,085	-6,355	-4.66%	78,534	60.37%	1,033	79,567	61.17%	2,398	1.84%
VAP	92,148			54,267	58.89%	574	54,841	59.51%	1,599	1.74%
061	135,426	-1,014	-0.74%	81,597	60.25%	1,557	83,154	61.40%	4,189	3.09%
VAP	93,829			53,919	57.47%	811	54,730	58.33%	2,761	2.94%
062	47,594	2,114	4.65%	26,174	54.99%	453	26,627	55.95%	3,694	7.76%
VAP	33,807			17,020	50.34%	229	17,249	51.02%	2,626	7.77%
063	46,032	552	1.21%	6,475	14.07%	180	6,655	14.46%	1,084	2.35%
VAP	33,447			4,153	12.42%	65	4,218	12.61%	747	2.23%
064	46,804	1,324	2.91%	4,837	10.33%	269	5,106	10.91%	4,090	8.74%
VAP	34,860			3,439	9.87%	131	3,570	10.24%	2,901	8.32%
065	45,135	-345	-0.76%	3,464	7.67%	181	3,645	8.08%	1,985	4.40%
VAP	31,616			2,370	7.50%	70	2,440	7.72%	1,343	4.25%
066	45,846	366	0.80%	11,655	25.42%	484	12,139	26.48%	13,843	30.19%
VAP	34,745			8,179	23.54%	266	8,445	24.31%	10,059	28.95%
067	95,464	4,504	4.95%	6,607	6.92%	302	6,909	7.24%	5,882	6.16%
VAP	67,061			4,749	7.08%	106	4,855	7.24%	3,848	5.74%
068	43,338	-2,142	-4.71%	7,028	16.22%	344	7,372	17.01%	5,448	12.57%
VAP	31,846			4,644	14.58%	150	4,794	15.05%	3,567	11.20%
069	88,495	-2,465	-2.71%	22,611	25.55%	947	23,558	26.62%	21,511	24.31%
VAP	65,192			15,423	23.66%	494	15,917	24.42%	14,954	22.94%
070	140,596	4,156	3.05%	12,018	8.55%	601	12,619	8.98%	7,379	5.25%
VAP	98,219			7,759	7.90%	202	7,961	8.11%	4,844	4.93%
071	92,618	1,658	1.82%	4,724	5.10%	235	4,959	5.35%	3,157	3.41%
VAP	65,247			3,130	4.80%	76	3,206	4.91%	2,047	3.14%
072	43,406	-2,074	-4.56%	16,131	37.16%	184	16,315	37.59%	858	1.98%
VAP	31,311			10,566	33.75%	61	10,627	33.94%	581	1.86%
073	45,550	70	0.15%	5,377	11.80%	146	5,523	12.13%	767	1.68%
VAP	32,978			3,730	11.31%	49	3,779	11.46%	453	1.37%
074	47,617	2,137	4.70%	7,706	16.18%	180	7,886	16.56%	1,633	3.43%
VAP	40,887			5,505	13.46%	95	5,600	13.70%	1,208	2.95%
075	44,796	-684	-1.50%	18,647	41.63%	295	18,942	42.29%	4,500	10.05%
VAP	35,450			12,791	36.08%	155	12,946	36.52%	3,111	8.78%
076	44,818	-662	-1.46%	4,291	9.57%	91	4,382	9.78%	1,394	3.11%
VAP	32,396			2,902	8.96%	25	2,927	9.04%	895	2.76%
077	47,673	2,193	4.82%	16,943	35.54%	188	17,131	35.93%	1,044	2.19%
VAP	35,684			11,565	32.41%	82	11,647	32.64%	690	1.93%
078	47,204	1,724	3.79%	14,498	30.71%	101	14,599	30.93%	888	1.88%
VAP	35,312			10,261	29.06%	43	10,304	29.18%	654	1.85%
079	44,772	-708	-1.56%	6,300	14.07%	215	6,515	14.55%	1,344	3.00%
VAP	31,431			4,320	13.74%	49	4,369	13.90%	868	2.76%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
080	44,516	-964	-2.12%	3,711	8.34%	149	3,860	8.67%	969	2.18%
VAP	31,427			2,473	7.87%	44	2,517	8.01%	595	1.89%
081	44,362	-1,118	-2.46%	33,912	76.44%	627	34,539	77.86%	2,134	4.81%
VAP	31,295			23,178	74.06%	348	23,526	75.17%	1,436	4.59%
082	43,458	-2,022	-4.45%	18,382	42.30%	441	18,823	43.31%	2,219	5.11%
VAP	30,774			11,672	37.93%	183	11,855	38.52%	1,412	4.59%
083	44,520	-960	-2.11%	26,447	59.40%	549	26,996	60.64%	2,848	6.40%
VAP	29,687			16,248	54.73%	269	16,517	55.64%	1,795	6.05%
084	93,506	2,546	2.80%	34,034	36.40%	852	34,886	37.31%	8,131	8.70%
VAP	66,555			21,650	32.53%	364	22,014	33.08%	5,597	8.41%
085	94,869	3,909	4.30%	6,182	6.52%	189	6,371	6.72%	1,878	1.98%
VAP	67,643			4,164	6.16%	64	4,228	6.25%	1,234	1.82%
086	47,681	2,201	4.84%	3,712	7.79%	146	3,858	8.09%	1,247	2.62%
VAP	33,226			2,434	7.33%	46	2,480	7.46%	809	2.43%
087	47,720	2,240	4.93%	5,947	12.46%	133	6,080	12.74%	917	1.92%
VAP	34,694			3,946	11.37%	31	3,977	11.46%	633	1.82%
088	88,153	-2,807	-3.09%	20,523	23.28%	421	20,944	23.76%	2,707	3.07%
VAP	64,936			13,965	21.51%	104	14,069	21.67%	2,017	3.11%
089	45,107	-373	-0.82%	7,974	17.68%	109	8,083	17.92%	1,073	2.38%
VAP	32,863			5,381	16.37%	30	5,411	16.47%	815	2.48%
090	43,477	-2,003	-4.40%	21,284	48.95%	142	21,426	49.28%	678	1.56%
VAP	31,216			14,130	45.27%	46	14,176	45.41%	486	1.56%
091	45,597	117	0.26%	9,954	21.83%	89	10,043	22.03%	543	1.19%
VAP	33,947			7,077	20.85%	39	7,116	20.96%	362	1.07%
092	43,387	-2,093	-4.60%	19,064	43.94%	226	19,290	44.46%	821	1.89%
VAP	31,583			12,784	40.48%	107	12,891	40.82%	565	1.79%
093	44,343	-1,137	-2.50%	15,677	35.35%	125	15,802	35.64%	623	1.40%
VAP	32,449			11,087	34.17%	45	11,132	34.31%	427	1.32%
094	43,527	-1,953	-4.29%	18,361	42.18%	162	18,523	42.56%	609	1.40%
VAP	34,085			13,568	39.81%	81	13,649	40.04%	430	1.26%
095	44,590	-890	-1.96%	21,491	48.20%	141	21,632	48.51%	397	0.89%
VAP	33,210			14,926	44.94%	53	14,979	45.10%	250	0.75%
096	46,835	1,355	2.98%	18,105	38.66%	381	18,486	39.47%	1,155	2.47%
VAP	35,885			12,474	34.76%	156	12,630	35.20%	807	2.25%
097	43,531	-1,949	-4.29%	24,834	57.05%	401	25,235	57.97%	1,198	2.75%
VAP	31,919			16,820	52.70%	174	16,994	53.24%	806	2.53%
098	44,196	-1,284	-2.82%	27,107	61.33%	395	27,502	62.23%	751	1.70%
VAP	33,044			18,858	57.07%	186	19,044	57.63%	524	1.59%
099	43,263	-2,217	-4.87%	16,887	39.03%	413	17,300	39.99%	1,210	2.80%
VAP	29,853			10,764	36.06%	132	10,896	36.50%	749	2.51%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
100	44,193	-1,287	-2.83%	23,801	53.86%	425	24,226	54.82%	1,547	3.50%
VAP	30,755			15,217	49.48%	177	15,394	50.05%	1,104	3.59%
101	47,733	2,253	4.95%	18,346	38.43%	179	18,525	38.81%	715	1.50%
VAP	37,499			13,324	35.53%	96	13,420	35.79%	577	1.54%
102	46,812	1,332	2.93%	16,445	35.13%	88	16,533	35.32%	1,462	3.12%
VAP	33,477			10,435	31.17%	34	10,469	31.27%	1,055	3.15%
103	43,813	-1,667	-3.67%	22,148	50.55%	116	22,264	50.82%	509	1.16%
VAP	31,723			15,096	47.59%	63	15,159	47.79%	339	1.07%
104	45,537	57	0.13%	13,620	29.91%	128	13,748	30.19%	468	1.03%
VAP	33,283			9,525	28.62%	63	9,588	28.81%	321	0.96%
105	47,008	1,528	3.36%	29,625	63.02%	211	29,836	63.47%	473	1.01%
VAP	34,612			20,214	58.40%	108	20,322	58.71%	336	0.97%
106	47,513	2,033	4.47%	9,172	19.30%	126	9,298	19.57%	687	1.45%
VAP	35,706			6,060	16.97%	53	6,113	17.12%	478	1.34%
107	47,542	2,062	4.53%	32,507	68.38%	222	32,729	68.84%	668	1.41%
VAP	33,479			21,200	63.32%	93	21,293	63.60%	445	1.33%
108	46,736	1,256	2.76%	14,123	30.22%	267	14,390	30.79%	1,478	3.16%
VAP	34,504			9,998	28.98%	108	10,106	29.29%	1,021	2.96%
109	44,376	-1,104	-2.43%	14,617	32.94%	261	14,878	33.53%	1,354	3.05%
VAP	33,248			10,597	31.87%	120	10,717	32.23%	908	2.73%
110	45,737	257	0.57%	6,726	14.71%	119	6,845	14.97%	772	1.69%
VAP	34,113			4,901	14.37%	50	4,951	14.51%	508	1.49%
111	43,443	-2,037	-4.48%	25,509	58.72%	523	26,032	59.92%	2,475	5.70%
VAP	31,122			17,279	55.52%	199	17,478	56.16%	1,651	5.30%
112	43,853	-1,627	-3.58%	18,751	42.76%	229	18,980	43.28%	1,710	3.90%
VAP	32,617			12,489	38.29%	105	12,594	38.61%	1,245	3.82%
113	43,806	-1,674	-3.68%	25,213	57.56%	630	25,843	58.99%	2,440	5.57%
VAP	31,305			16,734	53.45%	251	16,985	54.26%	1,730	5.53%
114	44,773	-707	-1.55%	24,556	54.85%	138	24,694	55.15%	1,455	3.25%
VAP	32,647			17,263	52.88%	64	17,327	53.07%	966	2.96%
115	44,351	-1,129	-2.48%	13,344	30.09%	221	13,565	30.59%	1,332	3.00%
VAP	32,070			8,708	27.15%	73	8,781	27.38%	908	2.83%
116	44,110	-1,370	-3.01%	19,888	45.09%	130	20,018	45.38%	1,393	3.16%
VAP	31,750			13,107	41.28%	62	13,169	41.48%	946	2.98%
117	47,750	2,270	4.99%	7,312	15.31%	231	7,543	15.80%	1,419	2.97%
VAP	33,803			4,849	14.34%	64	4,913	14.53%	928	2.75%
118	43,713	-1,767	-3.89%	13,287	30.40%	87	13,374	30.60%	620	1.42%
VAP	32,949			9,410	28.56%	31	9,441	28.65%	453	1.37%
119	43,904	-1,576	-3.47%	15,269	34.78%	121	15,390	35.05%	509	1.16%
VAP	32,045			10,210	31.86%	53	10,263	32.03%	323	1.01%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
120	46,731	1,251	2.75%	12,721	27.22%	115	12,836	27.47%	3,047	6.52%
VAP	33,993			8,505	25.02%	55	8,560	25.18%	1,886	5.55%
121	94,840	3,880	4.27%	26,788	28.25%	501	27,289	28.77%	6,490	6.84%
VAP	69,119			18,501	26.77%	182	18,683	27.03%	4,276	6.19%
122	46,286	806	1.77%	15,530	33.55%	244	15,774	34.08%	1,143	2.47%
VAP	33,195			10,409	31.36%	116	10,525	31.71%	800	2.41%
123	47,747	2,267	4.98%	6,765	14.17%	222	6,987	14.63%	1,302	2.73%
VAP	34,582			4,384	12.68%	73	4,457	12.89%	855	2.47%
124	86,779	-4,181	-4.60%	51,044	58.82%	556	51,600	59.46%	2,099	2.42%
VAP	64,295			34,531	53.71%	280	34,811	54.14%	1,514	2.35%
125	44,644	-836	-1.84%	22,198	49.72%	275	22,473	50.34%	775	1.74%
VAP	33,869			15,260	45.06%	138	15,398	45.46%	559	1.65%
126	47,657	2,177	4.79%	3,842	8.06%	111	3,953	8.29%	705	1.48%
VAP	36,771			2,636	7.17%	49	2,685	7.30%	465	1.26%
127	47,662	2,182	4.80%	10,692	22.43%	422	11,114	23.32%	1,933	4.06%
VAP	33,755			6,892	20.42%	133	7,025	20.81%	1,222	3.62%
128	44,652	-828	-1.82%	22,297	49.94%	493	22,790	51.04%	1,880	4.21%
VAP	31,303			14,677	46.89%	175	14,852	47.45%	1,222	3.90%
129	95,060	4,100	4.51%	21,966	23.11%	439	22,405	23.57%	3,608	3.80%
VAP	68,111			14,366	21.09%	145	14,511	21.30%	2,360	3.46%
130	45,022	-458	-1.01%	11,176	24.82%	136	11,312	25.13%	3,840	8.53%
VAP	32,132			7,478	23.27%	46	7,524	23.42%	2,359	7.34%
131	46,341	861	1.89%	12,243	26.42%	108	12,351	26.65%	1,531	3.30%
VAP	34,227			8,255	24.12%	45	8,300	24.25%	1,037	3.03%
132	43,304	-2,176	-4.78%	15,992	36.93%	130	16,122	37.23%	803	1.85%
VAP	31,817			10,684	33.58%	63	10,747	33.78%	535	1.68%
133	43,375	-2,105	-4.63%	19,705	45.43%	334	20,039	46.20%	2,072	4.78%
VAP	31,561			13,719	43.47%	158	13,877	43.97%	1,403	4.45%
134	43,239	-2,241	-4.93%	20,234	46.80%	110	20,344	47.05%	534	1.23%
VAP	31,533			13,357	42.36%	54	13,411	42.53%	314	1.00%
135	43,390	-2,090	-4.60%	28,384	65.42%	205	28,589	65.89%	684	1.58%
VAP	31,050			18,803	60.56%	94	18,897	60.86%	456	1.47%
136	43,351	-2,129	-4.68%	28,364	65.43%	163	28,527	65.80%	495	1.14%
VAP	31,163			19,118	61.35%	86	19,204	61.62%	326	1.05%
137	47,504	2,024	4.45%	6,975	14.68%	111	7,086	14.92%	2,367	4.98%
VAP	34,376			4,687	13.63%	49	4,736	13.78%	1,497	4.35%
138	46,891	1,411	3.10%	16,703	35.62%	98	16,801	35.83%	3,480	7.42%
VAP	33,348			10,756	32.25%	33	10,789	32.35%	2,428	7.28%
139	44,064	-1,416	-3.11%	8,908	20.22%	123	9,031	20.50%	1,786	4.05%
VAP	32,035			5,589	17.45%	43	5,632	17.58%	1,100	3.43%



DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
140	43,309	-2,171	-4.77%	18,790	43.39%	142	18,932	43.71%	1,813	4.19%
VAP	31,243			12,468	39.91%	58	12,526	40.09%	1,134	3.63%
141	86,466	-4,494	-4.94%	31,697	36.66%	263	31,960	36.96%	2,797	3.23%
VAP	62,666			20,873	33.31%	132	21,005	33.52%	1,848	2.95%
142	43,318	-2,162	-4.75%	17,235	39.79%	208	17,443	40.27%	899	2.08%
VAP	32,483			11,409	35.12%	110	11,519	35.46%	623	1.92%
143	43,255	-2,225	-4.89%	13,435	31.06%	229	13,664	31.59%	1,135	2.62%
VAP	31,454			9,275	29.49%	85	9,360	29.76%	775	2.46%
144	46,486	1,006	2.21%	14,379	30.93%	148	14,527	31.25%	1,950	4.19%
VAP	33,820			9,721	28.74%	78	9,799	28.97%	1,304	3.86%
145	43,725	-1,755	-3.86%	11,375	26.01%	129	11,504	26.31%	742	1.70%
VAP	32,752			7,992	24.40%	56	8,048	24.57%	475	1.45%
146	47,668	2,188	4.81%	3,661	7.68%	102	3,763	7.89%	1,148	2.41%
VAP	35,929			2,511	6.99%	38	2,549	7.09%	773	2.15%
147	43,664	-1,816	-3.99%	8,783	20.11%	294	9,077	20.79%	1,585	3.63%
VAP	29,832			5,566	18.66%	89	5,655	18.96%	975	3.27%

Total Population: 8,186,453

Ideal Value: 45,480

#### Summary Statistics

Population Range: 43,209 to 176,939

Absolute Range: -6,708 to 4,504

Absolute Overall Range: 11,212

Relative Range: -14.75% to 9.90%

Relative Overall Range: 24.65%



NORTHERN

DISTRICT OF

GEORGIA

SARA LARIOS, WHIT AYRES, VIRGINIA A. BALFOUR,  
GEORGIA BENTON, PAM BOHANNON, MERRI BRANTLEY,  
JOEY BRUSH, CRAIG BURNS, ASHLENE CORR,  
DONALD CORR, ROBERT F. DALLAS, RETA DODD,  
P. MARTIN ELLARD, SETH HARP, DAVID MARKEY,  
FELIX MORING, ROBERT H. OWEN, SR., LINDA  
PARKER, CHARLES PAYNE, JR., ROY ROBERTS,  
NANCY SCHAEFER, AUSTIN SCOTT, BOB TANGO,  
DEBBIE TANGO, CHARLIE TANKSLEY, DON THOMAS,  
MARC TYSON, JACK WILLIAMSON, DAVID YOUNG

ORIGINAL

SUMMONS IN A CIVIL CASE

CASE NUMBER:

1:03-CV-0693

v.

GEORGE E. "SONNY" PERDUE, TERRY COLEMAN,  
ERIC B. JOHNSON, CATHY COX

(Name and address of defendant)

Governor George E. "Sonny" Perdue  
Office of the Governor  
State Capitol  
Atlanta, GA 30334

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Frank B. Strickland  
Anne W. Lewis  
Strickland Brockington Lewis LLP  
1170 Peachtree Street, NE  
Suite 2000  
Atlanta, GA 30309

an answer to the complaint which is herewith served upon you, within 20 days after service of  
this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for  
the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of  
time after service.

J. D. THOMAS

CLERK

MAR 13 2003

DATE

*Chauhan*

(BY) DEPUTY CLERK

NORTHERN

DISTRICT OF

GEORGIA

ORIGINAL

SUMMONS IN A CIVIL CASE

CASE NUMBER:

1:03-CV-0693

SARA LARIOS, WHIT AYRES, VIRGINIA A. BALFOUR,  
GEORGIA BENTON, PAM BOHANNON, MERRI BRANTLEY,  
JOEY BRUSH, CRAIG BURNSED, ASHLENE CORR,  
DONALD CORR, ROBERT F. DALLAS, RETA DODD,  
P. MARTIN ELLARD, SETH HARP, DAVID MARKEY,  
FELIX MORING, ROBERT H.V. OWEN, SR., LINDA  
PARKER, CHARLES PAYNE, JR., ROY ROBERTS,  
NANCY SCHAEFER, AUSTIN SCOTT, BOB TANGO,  
DEBBIE TANGO, CHARLIE TANKSLEY, DON THOMAS,  
MARC TYSON, JACK WILLIAMSON, DAVID YOUNG

V.

GEORGE E. "SONNY" PERDUE, TERRY COLEMAN,  
ERIC B. JOHNSON, CATHY COX  
10. (Name and address of defendant)

Terry Coleman  
332 State Capitol  
Atlanta, GA 30334

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v.

GEORGE E. "SONNY" PERDUE, TERRY COLEMAN,  
ERIC B. JOHNSON, CATHY COX

TO: (Name and address of defendant)

Eric B. Johnson  
State Capitol  
Room 321  
Atlanta GA 30334

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Anne W. Lewis  
Strickland Brockington Lewis LLP  
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Suite 2000  
Atlanta, GA 30309

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NORTHERN

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GEORGIA

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## SUMMONS IN A CIVIL CASE

CASE NUMBER:

1:03-CV-0693

V.

GEORGE E. "SONNY" PERDUE, TERRY COLEMAN,  
 ERIC B. JOHNSON, CATHY COX

TO: (Name and address of defendant)

Cathy Cox  
 Office of the Secretary of State  
 State Capitol  
 214 State Capitol  
 Atlanta, GA 30334

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Frank B. Strickland  
 Anne W. Lewis  
 Strickland Brockington Lewis LLP  
 1170 Peachtree Street, NE  
 Suite 2000  
 Atlanta, GA 30309

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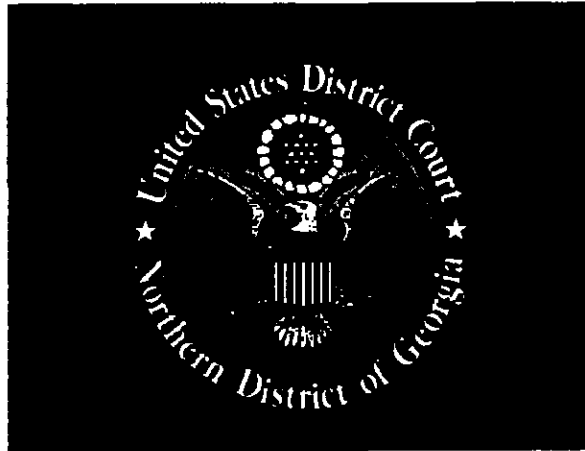
LUTHER D. THOMAS

CLERK

MAR 13 2003

DATE

*C. Deucher*  
 (BY) DEPUTY CLERK



## EXHIBIT / ATTACHMENT

L

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(To be scanned in place of tab)

Received  
9/6/03  
from EEOC  
- y.h.

February 11, 2003

For several months I have become increasingly concerned for my safety here at Lenbrook. Quite some time ago, I became aware that my co-worker, Yolanda Martin has some paranoid delusions. She has personally said things to me to suggest that she is a walking "time bomb". I believe that Ms. Martin may snap at any time. Should this occur, I believe I would be at "high risk". Ms. Martin has demonstrated a clear dislike for me and I would definitely be a target.

While I recognize that this sort of thing rarely happens, there have been several documented cases in which people have simply snapped. I don't want to become paranoid myself, but my bible tells me to watch as well as to pray.

Robin M Ramsey

*Robin M. Ramsey*



## EXHIBIT / ATTACHMENT

          M          

(To be scanned in place of tab)

February 13, 2003

Received  
9/6/03  
from EEOC  
-y.m.

In response to the request for specifics to my statement about Ms. Yolanda Martin dated February 11, 2003:

..."my co-worker, Yolanda Martin has some paranoid delusions."

I never  
said  
that  
to Robin

When the computer at the front desk was going on and off, she stated to me that she felt as though she was being sabotaged internally."

I had printed something from the front desk that comes out on Donna Morris' printer. When I gathered up the items from the printer there were several sheets of paper that were part of something Ms. Martin was preparing. After I saw those pages, there was a passage in there regarding a book that I had at my desk that was given to me by a resident in which Ms. Martin felt someone was sending her "messages" by the book being left at the front desk. Actually there were two books - "The Southern Cross" and "The Killing Fields". Both of these books had been given to me by residents.

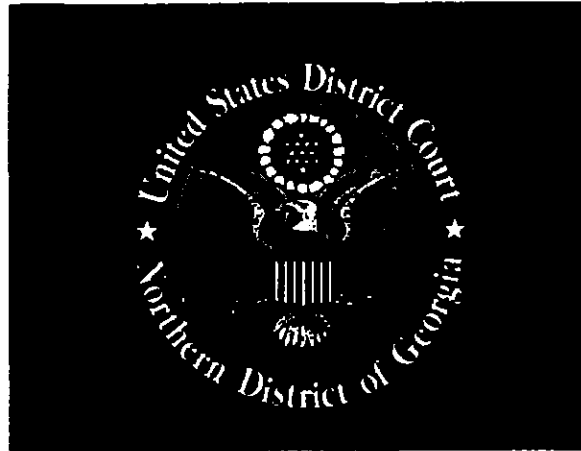
This is not  
true

..."Ms. Martin has demonstrated a clear dislike for me..."

When I am trying to relay information to her from the end of my shift and the beginning of hers, she will not look at me, respond or acknowledge what I said. Not all the time, but most of the time. There have been a couple of times when she has been kind of nasty. One day when I was trying to tell her about something, she responded curtly with, "I already know that."

Robin M. Ranally





## EXHIBIT / ATTACHMENT

N

(To be scanned in place of tab)



February 13, 2003

Yolanda Martin  
361 Westview Drive  
Apt. 4  
Atlanta, GA 30310

Dear Yolanda Martin,

Based on concerns voiced by a Lenbrook Associate for their safety, a psychiatric evaluation has been scheduled for you with Dr. Dave M. Davis on Monday, February 17, 2003 at 10:00 a.m. Dr. Davis' office is located at the Piedmont Psychiatric Clinic, 1938 Peachtree Road N.W., Suite 505, Atlanta, Georgia 30309-1258.

Please make every effort to attend this evaluation. You will be placed on leave with pay until a final determination is made with regards to your employment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Allen Christoppher".

Allen Christoppher  
Director of Human Resources  
Lenbrook Square In Buckhead



## EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)



LENBROOK  
*in Buckhead*

3747 Peachtree Road, N.E.  
Atlanta, Georgia 30319  
December 6, 2002

Telephone: (404) 262-4580  
Fax: (404) 264-3376

Yolanda Martin  
361 West View Drive  
Apt. 4  
Atlanta, GA 30310

Re: Feeling unsafe

Dear Yolanda Martin:

On December 4, 2002, you asked me to come to the Receptionist's Desk. When I arrived you showed me the file where you are typing your complaint and it now does not allow you access. And you stated "this makes for more suspicion since I have access to the remaining files on my disk but where I have my complaints I'm denied especially since this is a new disk". The Valet on duty and myself suggested that you try to convert the disk to notepad since you have characters on word and notepad does not recognize these characters. After we tried this process and it did not work, you stated "they (Lenbrook's Tech Support) are playing around with your file when I try to open it." And you say this because you have viewed Tech Support using PC Anywhere on the Receptionist's computer along with others".

During our conversation, when we were discussing other methods of completing your complaint you made a strong statement that "no one better not try anything or someone is going to jail or something". I then asked you "if you feel like you are being threatened and do you feel unsafe". You stated, "you haven't felt safe for a few years and since you went to HR you feel more threatened". I then asked would you like to leave or take some time off since you feel unsafe at work. And you replied, "no one is going to run me away".

I would like to know how can I, as Director of Human Resources for Lenbrook Square, assist you in bringing this matter past and present to a resolution. For over a month, I have asked you for your complaint in writing because what you have come to me with bits and pieces, no details. I cannot move forward with a proper investigation until I know what is involved. I would like for you to please complete your complaint so that we (Lenbrook and yourself) can move forward to a conclusion so you feel safe at work again.

Sincerely,

Allen Christopher  
Director of Human Resources

AC

REDEFINING RETIREMENT LIVING

*Lenbrook in Buckhead is Georgia's first community accredited by the Continuing Care Accreditation Commission.  
Lenbrook Square Foundation, Inc.*



## EXHIBIT / ATTACHMENT

          P          

(To be scanned in place of tab)

*type brought to my attention  
12/10/02 Allen in HP changed original or as well*

Allen Christopher,  
Lawrette Pettigrew,  
Debbie Taylor,  
Lenbrook Board Members  
C/o Lenbrook...Retirement Community  
3747 Peachtree Road, NE  
Atlanta, Georgia 30319

Yolanda Martin  
361 Westview Dr., apt. #4  
Atlanta, Georgia 30310  
(404) 758-5441

Allen,

You have repetitively asked for my written statements regarding my grievances as I have discussed with you; and I have continually been curtailed from completing this particular report, as in what appears to be external intervention possibly from those who daily monitor what I do on this – Front Desk Computer. I have been informed by a certain Lenbrook Associate that monitoring software had indeed been downloaded on the Front Desk computer – which has been the primary source used to type my Lenbrook Grievance Report. Furthermore, I have watched as other users remotely operated either this and/or other computers from their homes and/or other internal systems; too, I have been asked to assist with such operations. Also, I was told when the Front Desk computer was first installed that we would eventually receive a printer, but that in the meantime it was permissible for us to print via Donna Morris's printer – which very recently had been disconnected and/or rerouted from the Front Desk computer to Donna Knox's computer in Accounting. I assumed that the transfer was an error on one occasion and re-routed the printer back to Donna Morris's printer; shortly afterwards, Rodney came out and re-routed it back to Donna Knox's printer, for whatever reasons.

This past Tuesday, the computer at the Front Desk froze as I was editing the document of concern, on the brink of its completion; nonetheless, 98% of the information was already saved on my disk at this point. So I estimated about a 2% loss of information in restarting the computer, as I have successfully done so in the past when this occurred. I was able to pull the document up on Donna Morris's computer, from whence I had started printing it, so that I could assess what had been saved and what hadn't and continue in the editing process – as in inserting and reinserting missing information (not only from this particular incident, but from others prior) and checking for grammatical and typographical errors; notwithstanding, my print job was interrupted after only three pages and thus began the process of the locking and/or distortion of my document, which has been transferred to several different disks – new and used – but none of which retain the most current changes, however. Notwithstanding, I have had problems with this particular document on every disk that it has been transferred to.

This marks one of a series of occurrences and/or interferences that has resulted in either the damaging or total loss of this document of thirty-five pages (single-spaced, 12 pt font size) thus far that I am currently in the process of retyping. I was literally ill behind it. Luckily, I had retained a

less recent typed (printed) copy of the document with the proper manual changes, which I am using to professionally restructure this report with those particular changes. One of the major interferences has been that this report has been "Locked for Editing" several different times (when this occurred I would Copy the Read only file, save it in and as a New Document and resume from thereon). Restrictions have also come in the form of "File Permission Errors," as you have witnessed. I have been using computers for a long time – not that I'm an expert, but I have seldom experienced the manner of problems that I have very recently.

I was told by a Dominique at Kinko's down the street that my disk – not the current disk of concern, however, had to be *de-fragmented* on one occasion when I experienced synonymous problems incurred at Lenbrook's Front Desk computer. Although he managed to unlock my document, I had to tailor quite a bit of information that had been mistranslated. All-too-eager-to-assist Dominique could not figure out the problem this time, although in his scanning the current disk of concern for defects he could find none. I was privileged to watch this time as he checked, whereas with the prior disk I was not; for as Dominique contended, the only computer suited for the job on that particular occasion was behind the Service Counter – accessible only to Kinko's staff. He (Dominique) and others at Kinko's – where I had taken both the former and current disk (documents) of concern – did suggest that the current document of concern had been saved in Word Perfect; I assured him/them that I had only used Microsoft Word. And even if the document had been saved in Word Perfect, I do know that it would be feasible to open it in Microsoft Word or another like program under normal circumstances. You and Ryan Baldwin – one of Lenbrook's Valet drivers who came over with you to witness what had been done to my document – did suggest opening my report in Notepad and/or WordPad, which of course did not work. Under the circumstances, I'm beginning to wonder if Lenbrook is as welcoming of this report as has been alleged.

As I have told you, I was threatened and have had my car vandalized on your property and have had several other odd occurrences to befall me therewithal (which has been reported to the proper authorities) after commenting on unjust practices at Lenbrook – such as racial biases. I also discussed other matters with you such as non-dispersing of (retroactive) wages due to me, et cetera, et cetera. This is very important to me, as shedding light on the discussed issues will set the record straight once and for all; I have been reading between the lines of the hints thrown back and forth at me by various staff and residents who are either biased or misinformed. I am diligently working on completing my comprehensive report of grievances, which I will get to you as soon as possible. I too have all pertinent documents for your perusal.

  
Yolanda Martin

PS: This is to heal, not to wound.



## EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)



*I requested this*

February 4, 2003

Memo to: Yolanda Martin, Concierge

From: Lawrette Pettigrew, Director of Resident Services

*Lawrette Pettigrew*

Debbie Taylor, President/CEO, has informed me that she has told you to take Wednesday, February 5<sup>th</sup>; Thursday, February 6<sup>th</sup>; and Friday, February 7<sup>th</sup>, 2003 off from Lenbrook, with pay, to complete, what you have told us is, your "Grievance Report". I have found coverage for your shift for those specific days.



## EXHIBIT / ATTACHMENT

\_\_\_\_\_ R \_\_\_\_\_

(To be scanned in place of tab)



February 6, 2003

Time off to finish complaint

Yolanda Martin  
361 Westview Drive  
Apt. 4  
Atlanta, GA 30310

Dear Yolanda,

As you know, we have provided you with three (3) days paid leave so you can complete your written complaint regarding your perceived unfair treatment and harassment at Lenbrook Square. Lenbrook Square takes very seriously any allegations of this nature and, consequently, we wanted to provide you with adequate time to document all instances of alleged harassment. As of February 4, 2003, we had received an eleven (11) page draft of your complaint and our Human Resources Department has already begun an investigation of your claims. Based on my conversation with you on February 3, 2003, I understand you have an additional twenty-five (25) pages to supplement your first complaint. Pursuant to our agreement, you will provide me with a final written complaint by no later than February 10, 2003 at 10:00 a.m.

I look forward to receiving your final complaint and hopefully resolving these issues in a timely and acceptable fashion. Should you have any questions, please do not hesitate to contact me or Allen Christopher.

Sincerely,

Deborah "Debbie" Taylor  
President/CEO  
Lenbrook Square in Buckhead



## EXHIBIT / ATTACHMENT

5

(To be scanned in place of tab)

Yolanda Martin, Second Shift Concierge  
Lenbrook In Buckhead Retirement Community  
3747 Peachtree Road, NE  
Atlanta, Georgia 30319

2/10/03

Allen Christopher, Director of Human Resources  
Lawrette Pettigrew, Director of Resident Services  
Debbie Taylor, President & CEO  
Tom Poore, Lenbrook Security  
Gordon Sherman/Lenbrook Board Members...  
Lenbrook...Retirement Community  
3747 Peachtree Road, NE  
Atlanta, Georgia 30319

Complete for  
the most part,  
although there  
have been  
other recent  
occurrences!  
2/10/03  
Y. Martin

Dear Allen,

### *Exordium*

Per your continual requests and our conversations on Monday 11/04/02 and since, this is a copy of the extensive report regarding matters as we discussed. Copies have also been delivered to those addressed. This is a formal notification of occurrences as have transpired between myself and other staff at Lenbrook in correlation to my verbal and written expressions of dismay of unjust policies and practices as they have directly and indirectly affected me and other employees of Color and/or lower socio-economic status who are yet employed here and those previously employed. It is also an overview of those particular policies and practices of concern and of a series of odd events that have occurred since my commenting on them. It would be an injustice to me and quite a few others for these matters not to be addressed and corrected, as for those that have not.

This is a testament to the fact that some so fervently ride the bandwagon of attempting to abase and/or control other people that they seldom stop to see just how injurious their actions are, not only to their subjects, but subsequently to all that surrounds them – not excluding their loved ones and/or families. Seldom do such persons pause to ask themselves “What if my sister, brother, mother, father, husband, wife, child, et cetera were handled in such a manner?” This is a mirror for Lenbrook and a window into the wounds that she has inflicted upon me and others. This is not a resignation – not just yet, but rather a defense of my character, integrity and vitality. It is my sincere hope that such behavior as I will note will be further discouraged and that race and other relations at Lenbrook will continue to improve. *Some occurrences are too graphic for me to note in this report, but I will be as cordial as possible, given the circumstances.*

I am aware of the Fair Treatment Policy as outlined on page 26 (Procedure C) and the Complaint Procedures on pages 14 – 16 of the Lenbrook Associate Handbook (revised 2/13/02, which I received on Friday, July 12, 2002 after repetitive requests for it); nonetheless, it was impractical to estimate the length of time it would take to complete this report (although I’d attempted to do so), as so many things have transpired and are yet transpiring. But again, much of what’s in this report was discussed with you on 11/04/02 and again on 1/6/03 with both you and Lawrette during a meeting in which you informed me of the changes in the work hours of all



## EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

? The Longwood Strategic Planning Report  
(as identified by Allen Christopher)

## **I. Strengthen the core Operations through Improved systems and programs**

- A. Update and Revise all Policies and Procedures
  - a. Establish schedule for quarterly review of all policies and procedures by appropriate department director
  - b. Review and discuss a different associate related policy and procedure at least monthly during TEAM meetings
- B. Ensure consistent compliance to policies and procedures by all department directors
  - a. Increase interaction between Human Resources and department directors
  - b. Provide Yearly orientation class for all department directors
  - c. Provide yearly management training for department directors and front-line supervisors
  - d. Monitor associate complaints and grievances
- C. Develop community-wide preventative maintenance checklist
- D. Develop Corporate Compliance Program
  - a. Risk management
  - b. Ethics
  - c. HIPAA
  - d. Liability
- E. Decrease associate turnover
  - a. Refine Associate Orientation Program
    - 1. include tour of homes
    - 2. provide payroll training
      - a. Directors
      - b. Associates
  - b. Develop Employee Recognition Program
    - 1. Recognize associate accomplishments
      - a. Design an "Employee of the Month" Program
      - b. Develop a Quarterly newsletter for and about associate's achievements, acts of kindness, marriages, births - anything positive.
        - 1) In order to proceed each month, the facility occupancy rate must be X
        - 2) award financially
    - 2. Encourage supervisors and department directors to verbalize "work/job well done" daily
    - 3. Recognize one-year perfect attendance
      - a. Three personal days off with pay.
      - b. monetary recognition
    - 4. Recognize five, ten, and fifteen year associates on a quarterly basis with a recognition dinner.
      - a. CEO to speak
      - b. Department Directors to present award
    - 5. Hold an annual employee awards day

See page 2  
of Longwood Innovations

- a. Recognize years of service and perfect attendance
      - b. Recognize mentors
    - 6. Provide competitive wages and benefits package
    - 7. Offer associate meal program – you pay – you choose
  - c. Increase Staff Training
    - 1. Develop system to communicate to associates the types of training available
    - 2. provide yearly orientation classes for department directors
    - 3. Identify areas of organizational weakness and submit to Human Resources manager for appropriate company-wide training.
    - 4. provide training for ancillary/volunteer staff
      - a. Mission and philosophy of Lenbrook
      - d. Financial methodology
      - c. Role of each department
      - d. Role of nurse practitioner
      - e. Role of medical director
      - f. Safety and disaster plan
      - g. Risk management plan
    - 5. offer increased learning opportunities for associates
      - a. Offer in-house seminars from people in the external community
        - 1) low vision speaker
        - 3) speaker from the Alzheimer's Association
      - b. Encourage associates to make presentations
- F. Expand Mentoring Program
  - a. Develop criteria for mentors in each department
  - b. Allow flexibility in time needed for each new associate to grasp job duties
- ✓ G. Establish a more effective and efficient mode of transferring information through the food service department – see page 8 of Lenbrook Innovations
  - a. Install computer in the dietary storeroom
  - b. bar code all food items to improve and simplify rotation, distribution and inventory
  - c. install monitor in cooks and preps station

## **II. Improve Communications at all Levels**

- A. Define Roles and Responsibilities for Board of Directors, Consultants, and CEO
- B. Establish a "Jurisdiction Agreement" for all Department Directors
- C. Assist the Residents' Association Committee in Developing an Orientation program for new Residents
  - a. Participate in the orientation as requested by residents
  - b. Update new resident book
  - c. Develop an environmental service package for new residents with all pertinent information concerning maintenance, housekeeping, and



- security. Present to residents upon admittance and follow up within a month
- d. CEO to visit new residents within 90 days of residency
- D. Establish Regular Meetings with Associates and CEO
  - a. inform CEO of areas of associates' concerns
  - b. nice dinner or luncheon with CEO as speaker
- E. Develop a plan to communicate expansion news to the external marketplace as well as the community
- F. Establish a Resident Quality Control Program to replace yearly survey

### ✓ III. Create framework for the development of a resident generated endowment-giving program.

- A. Determine Resident Interest
- B. Initiate a Donation Programs

See page 2 of  
Lenbrook proposal as

### IV. Establish a more active and vibrant community

- A. Establish a Wellness program that includes Residents and Associates
- B. Expand the Activities departments to include wellness

### V. Make us financially viable to be in a position for development financing.

- A. Determine debt load
- B. Increase cash position
  - a. reduce spending by 5% in each department
  - b. stagger construction projects
  - \* c. decrease hours of 3-11 PM shift to 10:00 on weekdays for receptionists
  - d. do not add shuttle service in FYE 2003
  - e. eliminate overtime opportunities for all positions
  - f. train staff to be more aware of cost and to bid prices

### VI. Improve overall security of community

- A. Institute the Outside Personnel Service Providers Policy
- B. Increase Surveillance of Community
  - a. work closely with the Wellness program manager to target residents with cognitive and mobility concerns and address those concerns within the Lenbrook guidelines
  - b. develop a residents assessment program and implement it within the Lenbrook guidelines
  - c. involve concierge and security in stricter sign-in rules
  - d. require concierge and security personnel to attend "Safety and Security Measures for Front-Desk Personnel" seminar
  - e. add cameras at P1, P2 and gate entrances
  - f. evaluate other areas of the community for additional surveillance

**VII. Maintain accreditation status.**

- A. Assist the CEO in developing and implementing programs necessary to maintain Lenbrook's accreditation
- B. Submit in writing the programs and procedures for each area of responsibilities.



## EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

***Lenbrook Innovations***



***By Yolanda Martin***

## Lenbrook Innovations by Yolanda Martin

### Administration

#### Lenbrook Registration of Private Duty Workers or Assistants (see attachment samples)

Residential Assistants would be asked to complete forms, providing their names, who they are working for (and what hours), their addresses & telephone numbers and/or any other suitable information. Small photos of each Assistant (and their patient(s)) would be attached to their registration forms. Duplicates of these (Assistant's) photos may be used to create photo-identification badges as well. It would enhance the system of keeping up with all persons who enter the building on a day-to-day basis. Memorandums regarding this matter would be produced and distributed accordingly (see sample). These memos would instruct PA's (Private Assistants) to pick up blank registration forms and to drop off the completed forms at the Front Desk. Completed forms would be forwarded to Personnel from the Front Desk. The PA's personal information such as their addresses and Social Security Numbers would not be readily available to the Concierge, but only to Personnel. The PA's names, who they are working for and contact numbers, however, would be available to the Concierge so that they may be contacted if need be. Often PA's receive important telephone calls and visitors who do not know who they are working for. Some we know; but on many occasions, we do not. Alternative contact numbers would be useful as well in the event that the Concierge needs to contact PA's for their patients and/or the patient's families or other Assistants. Being informed of who our PA's are would not only be professional, it too would be a major upgrade to Security.

#### Computer for Concierge (already implemented, but some uses not)

It could be used as a medium of communication as in pertinent staff notifying the Front Desk as to their whereabouts; if they are in or out of their offices (vacationing or whatever the case may be) and if, when and what times they will return. This would eliminate the hassle of attempting to locate staff (particularly those whose offices are not readily accessible to the Concierge) who are away from their desks/offices, due to whatever circumstances. We will know definitively who is where, as staff logs in and out on their terminals, specifying this information and making it available to us. Thus, we can relay the appropriate information to callers, rather than having to guess where a particular Associate is when we are unable to reach them by phone and verbal or written information of this nature has not been passed on to us. This, of course, would cater to callers who request to **speak to** whatever Associate they are calling rather than leave voice mail messages to relay time-sensitive information. The Concierge may also perform simultaneous clerical duties as warranted. For example: updating forms – those in particular that we use at the Front Desk (updating and Concierge Report forms, Entrance Clearance Registers (see attachment), Residential Hospitalization Logs, etc), assisting the Office Manager or Resident Liaison (Donna Morris) with producing forwarding labels for residents and/or former residents' mail as needed and typing memos and/or reminders to pass on to other shifts and/or departments.

#### Administrative Access to Residential Mailroom\*

In lieu of or as an alternative to leaving resident's misdirected mail at the Front Desk for the Postman to put in their mailboxes and having circulations, publications, invoices, et cetera delivered to the resident's apartments, **appointed staff** would be given a key to the Residential Mail Room so that they may place these items in the residents' mail boxes.

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**Makeovers...**

For The Administrative Office & Bathroom – new carpet, wallpaper and perhaps ceiling tile, for the Lounge – at least new ceiling tile...I love the new Library arrangement!

**Mailboxes for Board Members (already implemented)**

...A single box, such as we now have, or individual boxes for each Board Member. There was initially no formal retainer for Board mail. It was simply placed in the Director of Resident Services mail box.

**Staff Incentives...**

(Awards, plaques, mugs, T-shirts, special recognition: "Perfect Attendance," "Employee (or Associate) of the Week (Month or Year) with a paid day or days off, etc. for the outstanding and/or loyal. An annual Awards ceremony would be yet another avenue to spice up the place. Both staff and the residents would enjoy and appreciate this, I'm sure. It would remind staff that we are appreciated and encourage us to maintain a standard of excellence and/or to improve what needs improving. Lenbrook staff makes Lenbrook happen; and so many staff members have dedicated so many years of their lives to doing just that and should be recognized for it.

**Lenbrook Colonial Communities\*****(An Outreach and Missions Initiative)** ✓

No person exists for her or his sake alone, nor should any organization abide without contributing to a cause greater than itself, as in Outreach and Missions. Not only would this bless the receivers, it would be a tax write-off for Lenbrook and/or any partners. Lenbrook would select a third world or underdeveloped country or community to nurture to maturity, providing wells and/or an irrigation system such as would be conducive to maintaining crops, sanitation (including a clean drinking water supply) and the likes. Providing Medical and Educational services and supplies of all merit and simultaneously training the citizens of the colony in the Medical, Home Building (Architectural) and Educational Professions as well as imparting Entrepreneurial and/or Marketing skills (as in E-commerce, international trade and the cultivation of natural resources) would equip citizens to serve their own communities, which is what would be the goal. In a world where there is plenty, no one – certainly not helpless little children – should be starving to death and/or plagued with terminal diseases due to ill nutrition and unsanitary living conditions.

I'm certain that others, in hearing of the success of this initiative would join the bandwagon of **Corporate Colonialism** and Lenbrook in making international headlines. Reports would be given and video essays of progress would be viewed on Big Screen Television during LIBRA (Lenbrook In Bulkhead Resident Association) and/or other Meetings. Certificates of Independence would be awarded to the community after satisfactory progress has been made and other countries and/or communities would be subsequently sponsored under the same initiative. Other Outreach venues would include: Feed The Children (800) 627-4556, Save The Children (800) 254-7788, World Vision (88) 423-4200, The Trinity Broadcasting Network (877) 888-0330 (Christian Outreach Ministries), Grady Hospital (404) 616-4307 (for assistance to abandoned babies) and others.

*The Sherman Building...\**

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...would consist of three sites: The Catherine S. Fain Ball Room, The Lenbrook Clubhouse and Recreation Hall and The Gordon J. Duquemin Theatrical Auditorium. It would sit on the new property as a separate entity – conjoined to both buildings.

#### *The Catherine S. Fain Ball Room*

"What's wrong with this joint?" – a regular question of Ms. Catherine Fain's - who is quite convinced that there are not enough activities for her and the general Lenbrook populace to partake of. The CSF Ballroom would be a spunky gathering spot for Lenbrook residents and guests to enjoy special parties (Christmas, Valentine's & St. Patrick's Day, Executive Balls, etc.) – dining with a full bar and kitchen, dancing with a formal dance floor, mounted disco ball and lights, a D.J. booth and all the makings of a good time!

#### **The Lenbrook Clubhouse (for Guided Water Aerobics, Weight Training, etc...) & Recreation Hall**

...A spas or spas, weights and/or other relevant equipment would be housed in this particular site for Guided Water Aerobics, Weight Training, etc. These are excellent forms of exercise, specifically for arthritics, who generally live in pain. This will aid in building muscle and reducing pain. I read an article on an arthritic 70+ year-old woman who went from hardly being able to move to a lean mean muscle machine. The Recreation Hall would consist of a bar, pool table, card rooms, jukebox (with all the Lenbrook (resident) favorites), et cetera.

#### *The Gordon J. Duquemin Theatrical Auditorium*

This twelve-hundred seat auditorium would cater to residents, staff and visitors from both the old and new buildings. Patrons would enjoy complimentary musicals & plays and Informative and/or Motivational Speakers on the one hand and a state of the art Cinematic theatre on the other, where popcorn, beverages and other refreshments could be served. Movies would be scheduled around events.

#### **The Lenbrook Hall of Fame...**

...would consist of elegantly framed, moderately sizable portraits or plaques attached to or containing brief, detailed biographies of Lenbrook residents – current and former – who have made outstanding contributions to society. This would be a feature of the G.J.D. Auditorium and would familiarize Lenbrook staff, residents and prospects as to Lenbrook's wealth of history and the historians who call(ed) it home. Lenbrook indeed harbors a wealth of history and historians whose brilliant accomplishments we are hardly aware of until we read them in obituaries; and unfortunately these are short-lived tributaries.

#### *Examples of Lenbrook Legends:*

- ❖ Mabel Boyter & Ruth Marett (deceased) – Musicians, highly acclaimed!
- ❖ Mr. Franklin Garrett (deceased) – Famed historian!
- ❖ Dr. Bruce Logue & Dr. Hamblin Letton (current residents) – Famed Medical Doctors!
- ❖ Mr. Dan McKeever (deceased) – Inventor of Artificial Limbs!
- ❖ Dr. William Laurens Pressley (deceased) – Founding President of the Westminster Schools
- ❖ Agnes McClendon (current resident) – Artist!
- ❖ Mr. Harlee Branch (deceased) – Headed the Georgia Power & Southern Companies, Emory University Trustee and a myriad of other things!

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- ❖ Dr. Manning Pattillo (current resident) – Retired President of Oglethorpe University, Acting President & Trustee of Woodruff Arts Center!
- ❖ Raymond K. Flege (current resident) – Professor Emeritus, Georgia Institute of Technology & Mildred Flege (deceased) – International Poet
- ❖ General Gordon Duquemin (retired former Administrator), the late General Render Braswell & General George Duncan (current resident)...and many, many more!

### **The Executive Box...\***

...would be a sizable shaded, but windowy oval-shaped lounge with a full kitchen and a bar mounted on the roof of either this and/or the other building for the gathering of those approved by the President and CEO (Debbie Taylor) for special occasions or events, like New Year's and Independence Day celebrations. Patrons would enjoy a magnanimous view of the Fireworks at Lenox while feasting on shrimp and cocktail sauce, Hors d'oeuvres and refreshments, watching special sporting events on big screen television and other private parties. An Executive Suite (with all the fixings), which would be a feature of the E-Box, would ever be reserved for the Chief. Other features of the E-Box would include two to three card rooms, two to three privileged guest suites, a refined Board Room with projectors and other equipment conducive to facilitating A-1 presentations (slide shows) with models, charts, diagrams, etc. and a conservative or mini Physical Fitness room with a treadmill, Stairmaster, stationary bicycle, bench press, etc., lockers and (a) shower(s).

### **Recorded Announcements/Music For Holding Callers**

It would let callers know that they are still connected throughout what they currently experience as silence while waiting to be transferred or connected to their parties. It would also be a wonderful Marketing venue. All departmental lines would carry the Recorded Announcements and/or Music for holding callers.

### **Message One (example)**

You've reached Lenbrook in Buckhead, the finest retirement community in the south and the first accredited in the state of Georgia. Lenbrook is both an independent and extended care facility with 24-hour Healthcare Assistance. We are located at 3747 Peachtree Road, North East of Lenox Mall and Phipps Plaza and in walking distance of Lenox and Brookhaven Train Stations. Interested in the Lenbrook experience? Or know someone who might be? Ask for Marketing or dial extension 3372 for Christ Adams, 4621 for Betty Sanders or 3386 for Penny Wigfall.

### **Message Two (example)**

Lenbrook is home to many of Atlanta's finest citizens and our world's key innovators and business leaders, both retired and active. Our residents enjoy valet parking, 24-hour Security, Pharmacy and Dry Cleaning Services, a Sundries Store, exquisite dining services with well-thought, well-planned menus by our Food Committee, complimentary transportation to local restaurants, shopping sites, matinees and a host of planned outings and activities. Internal activities and services include Book Talks, History Lectures, Vespers, Happy Hour, Sunday School, Complimentary Computer (Including Internet) Services and Classes, Copying Services, Arts & Crafts and many others.

### **Accepting The New Name**



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I do understand that Lenbrook's new full name is Lenbrook in Buckhead; however, the Concierge hasn't yet been instructed to greet incoming callers with the new name, at least I haven't. Also, and the primary reason for this suggestion is to bring to your attention the fact that the old (yellow and brown) "Lenbrook Square" sign is still sitting on the front lawn, which should be replaced to reflect the new name and the new colors – white, dark blue and aqua. As former things have passed and all is being made new, the external color of the building as well should also reflect this change – to suite the new Lenbrook colors.

## Human Resources

### **Appointment of EO Grievance Officers**

This could or may already fall under the duties of current staff, perhaps the Personnel Director. Identifying such a person and/or formally reiterating the concept of Staff Rights would give staff a sense of security and remind us that our concerns are just as important as those whom we serve. It would downplay the stigmas that hold staff in the bondage of silence in light of subtle and not so subtle injustices that all too often occur in job situations. We are all human beings and deserve to be treated with decency and respect, regardless of age, gender, race, creed, class or social status. Not only do we deserve it; we should daily bask in it.

### **Lenbrook In Buckhead Job Line**

It would be easier for potential staff to call a formal Lenbrook In Buckhead Job Line rather than having to call Personnel Associates – who, understandably, are not always accessible – or come by to see what positions are posted and/or available. Many companies have Job Lines. Personnel Associates would record and/or be responsible for recording current openings for the Lenbrook...Job Line.

## Security

### **All Employees' and Regular Visitors' Vehicle Registration\***

In the event that there are parking violations (Ex: someone parked in a tenant's parking space or a handicap parking space), such persons could be readily identified and asked to move. Or if someone's lights are left on or their windows are left down during or on the verge of rain and/or if perceived by Lenbrook officers as a threat to the security of the vehicle or if for any other reasons vehicle owners may need to be contacted, we would be less prone to having to guess who they are. Residents, of course, have their own assigned parking spaces and since vehicle registration for PA's would fall under the umbrella of general PA Registration that would leave only all other Lenbrook vehicle-owning employees and regular visitors and vendors, perhaps, to register.

### **Residential Key Upgrade\***

With so many failing VingCards – Berlene Goodwin having about thirty keys replaced and she not being the only one – considering other options would not be far fetched. [Valid only during stay. To extend stay, your keycard must be re-coded], which is noted on the back of the VingCARD, and [Check out Time – GUEST SAFETY TIPS], as it is termed on the VingCard protective jacket(s), suggests that this particular key was not fashioned for long term use, but probably for a hotel or the likes. Keyless Entry options come to mind; a con to such an option, however, would be the fact that others could possibly access and memorize and/or make

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note of residential keypad codes, thus gaining illegal access to resident's apartments unless there was a way (perhaps via fingerprint codes and/or a small camera installed above or near each resident's door) the system could recognize and grant access only to the residing tenant and/or any other approved persons. If this particular system were enacted, all PA's (Personal Assistants) would be granted their own personal access or entrance codes – never the resident's or other Assistant's personal access code(s); this would facilitate the process of keeping up with who is actually entering the apartment(s) at any given time.

The ILCO UNICAN is a Keyless Entry system with a lock and key as a back-up alternative. The chief con to this would be that it would probably discourage users from utilizing their access codes altogether, thus stifling the electronic monitoring system, unless somehow the alternative system were programmed to be usable only after unsuccessful **attempts** to gain entrance into a unit have been made and if the monitoring system could recognize when the alternative system is in use and who's using it or if otherwise the users would immediately notify Maintenance when problems occur with the Keyless system so that they may be corrected and not simply rely on the alternative system. Perhaps if the monitoring system immediately notified Maintenance and/or Security when the alternative system is being used, they could investigate to be certain that only authorized persons are entering the apartment. From my understanding, the Keyless Entry system is very reliable. Users would be encouraged to memorize their keypad codes (residents memorize their telephone numbers, debit card access codes, et cetera, so a three digit code shouldn't be a problem) and to the best of their ability keep documentation containing the codes out of the path of anyone otherwise unauthorized to use them.

The Intellikey is more on the scale of a Proximity Reader – which at least Lenbrook-wise – judging from residential complaints, is much more reliable than the VingCard(s); it is more identical, however, to a traditional metal key. These are options to consider; see attachments for more information. A-Abbot Safe & Lock Service (770) 850-0150 is one such company which may be contacted for these and other options and possibly installing a choice system.

### **Resident Tele-dial Gate Entry For Visitors (most gated communities have this)**

Even when visitors identify themselves and where they are going, it's not always 100% guaranteed that they are telling the truth. Visitors would have to make direct contact with residents via dialing their extensions at the gate and be buzzed in by the residents – who will press the pound key # or a three to four digit code to accomplish this. This too would be a major upgrade to Security. If residents are not home, not answering their telephones or are waiting downstairs, Security would follow up and act accordingly.

### **Extending (Moving) the Security Gate to Cover the Front Visitor's Parking Area\*** (Featuring Parking Attendant & Booth (optional))

The Security gate would be extended to cover the front Visitor's Parking area and an Attendant in a booth with air and heat would be posted at the gate to check identification and query visitors and/or staff who lack Proximity Readers as to their prospective destinations or Security could do this internally. Security would maintain a manual log of these transactions daily (see enclosure). There would be ample space enough for visitors, staff and/or residents to safely pull into the drive to gain entrance clearance via their Proximity Readers or Security and a turning loop for those who are denied entry or those in general who may need a turning point.

### **Valet Booth\***

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A Valet Booth with heat and air for the Valet Parkers would be well appreciated, I'm sure. I know that the VP's must sizzle in the Summer and freeze in the Winter as they linger for business on the outside. And it must be quite tedious bringing the Valet Podium and cones in and out of the building daily. For security purposes, residents' or guests' keys would never be left in the Valet Booth, but at the Front Desk (as is the current procedure), with Security or preferably in an internal – secured – Valet safe or box; cones, however, would be locked up inside of the booth. The Valet Booth would be wired for a telephone, which would also be locked in a discreet location inside the booth. The booth may also be monitored via an alarm/monitoring system.

### Getting Serious With Security\*

It is folly merely to ask visitors – who can write anything they want – to sign in and out of the building without a system of checks and balances. At communities such as Brannon and Maggie Russell Towers, it is required that all visitors leave valid photo identification at the Front Desk as they are signing in and that they pick it up as they are leaving. Otherwise, the Concierge cannot necessarily be certain that visitors are indeed who they say they are, unless we know them personally. Secondly, this method assures that guests indeed sign out as they are leaving – including those who park in the back parking lots – as they are not likely to leave without their driver's license and/or identification. Also with the issuance of Residential VingCards (keys) to multiple persons, such as residents' family members, Personal Assistants and other acquaintances, it is difficult to discern who is actually entering and exiting the premises – not excluding resident's living quarters. To remedy this, as I previously discussed with Residential key upgrade options, all keys for Personal Assistants, residents' family members and/or other acquaintances would be registered to those particular individuals. **If the front gate were programmed to close after each individual car enters the premises, the current system would be practically sound.** *Under the current, at least two to three cars can enter per opening; as such, many more persons can enter the doors than those with keys and/or who are cleared with Security and/or the Concierge.*

## Maintenance

### Commercial and/or Individual Residential (Water) Infiltration System(s)

When problems occur such as on 7/5/02 – when there was a “Boil Water Advisory” that was announced at noon on that particular day according to the water company but was only made known to Lenbrook after 5:00 p.m. by one of the residents, staff and residents would have the assurance that whether it be a City or in-house problem the water supply would be safe and drinkable and otherwise usable.

## Housekeeping

### (Shopping) Cart Drop

This would be an external service elevator or similar which would be used primarily by Housekeepers for taking shopping carts down to the parking lots versus tying up or interfering with the internal service elevator. This would save both Housekeeping and general Lenbrook elevator users a lot of time and hassle. Tenants with groceries could get express service to their floors directly from the parking lots!

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**Lenbrook Bell Boys...\***

...Would be responsible for assisting residents and their guests with luggage, groceries and other items; they would also be responsible for delivering flowers, parcels and perhaps in-house circulations and/or publications, the monthly residential invoices, et cetera as an option and/or alternative to putting them in the resident's mailboxes – which I suggested earlier as an Administrative duty.

**In-house Dry Cleaning Services\***

Dry Cleaning Services over the years has been delegated to the Sundries Store Clerk – who takes desiring resident's clothing out to an external Dry Cleaner juxtapose all of her other duties. In-house Dry Cleaning Services would eliminate the hassle of the Sundries Store Clerk of keeping up with all of the resident's clothing who utilize the service so that she may better attend to her own official duties as a Sundries Store Clerk; this would save a lot of wear and tear on her car as well. The hours of operation for the Lenbrook Dry Cleaner would be from 9:00 a.m. to 5:00 p.m. Monday's through Friday's and from 10:00 a.m. to 2:00 p.m. on Saturday's or as prescribed by Management, who would also decide upon a location for it. Profits would go towards the salaries of pertinent staff.

**Food Service****Residential Aides' Dining**

...It would mean company for our solo (resident) diners who would desire that their Aides or Assistants accompany them to the Dining Room during meals. Aides would respect the dress code, of course, and to maintain a favorable image, uphold all standards as they relate to dining. It would encourage residents who ordinarily wouldn't eat in the Dining Room – for a lack of companionship – to do so. It was disheartening to hear one of our former residents, Ms. Mewborn (deceased) – who would frequently sit across from the Reception area with her Assistant – comment on one particular occasion that she desired to eat in the Dining Room, but declined to do so because she didn't want to dine alone. It's equally disheartening to hear this from some of our current residents.

**A Direct Dietary Telephone Line\*** ✓

As there is at least one direct line on Healthcare, putting at least one direct line (with call-waiting, so that no calls would be missed) into the kitchen would better assure that Dietary Associates receive important phone calls in a timely manner. A Dietary Associate Call Log (see attachment) or a general message pad would be placed near this phone for whoever answers the phone to manually record messages for busy or absent Associates; and the Associates would be allowed to return calls at more opportune moments on this same phone, as this line would allow Dietary staff to call out as well as receive incoming calls (with a maximum five minute usage limit per call per staff). Staff would be warned against abusing this phone and would be subject to disciplinary action for not adhering to the policy governing its usage – which would be simply to receive, return and/or make EMERGENCY CALLS ONLY! The Direct Dietary Telephone Line (which could also be dialed from the Switchboard as in the transferring of external calls) would alleviate the service lines for service calls only. The number to the direct line would be rendered to pertinent callers as an emergency contact route. Associates would be encouraged to inform their callers of the DDTL policy as well.

**Social Services**

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**Residential Match Making Services...**

...This wouldn't be a dating service, per se, but would link interested residents to others of like interests and encourage their involvement in Lenbrook and/or other activities that may be of mutual interest to them. It would rescue some lonesome doves, breed new relationships and/or friendships, and enrich the lives of those who are reached. With so many neighbors, nobody has to be lonely or bored. Social interaction promotes longer, healthier lives.

**Cultural Affairs Appointee\***

Identifying, respecting and celebrating via planned activities (food, film & fiesta and/or outings, perhaps) the various cultures that constitute Lenbrook – our Irish Mr. Harmon Nicholson, our Ms. Elizabeth Buday from Budapest and others would make Lenbrook more personal for such persons and help us all to better understand and appreciate one another.

**Healthcare**

A Gary Null ~~client~~ *In Service & Inst*

**HCC PATIENT TRACKING OPTIONS****Wheel Stoppers**

Actually, this is an idea that Joe – a former Norred Security Officer – had to place these devices somewhat similar to speed breakers in front of the elevators so that the Healthcare residents cannot wheel themselves onto the elevators. It would facilitate the process of keeping up with the HCC residents, as some are known to ride up and down on the elevators and wheel themselves around on the other floors and even outside of the building, which presents concerns with safety. Notices of precaution (Ex: "Please watch your step") would be posted within the vicinity of the elevators on the Nurses Station to inform or remind others of the wheel stoppers so that they will not trip and fall. If the stoppers are conservative enough in size they may not present hazards for pedestrians.

**HCC Patient Tracking Pendant and/or Bracelet\***

~~could be~~ *this would be placed around the neck or wrists of HCC residents;*  
In-house Pharmacy\* *(over)*

As there have been concerns over the years with the services of external pharmacies that cater to Lenbrook, an In-house Pharmacy would mean maximum convenience. Residents would not have to wait for filled prescriptions to be delivered. The In-house Pharmacist would call residents and/or Nurses when their prescriptions have been filled for immediate pick-up. The administration of such a service would be undergirded by the fact that our President and CEO is a Registered Nurse. Profits would go towards the Pharmacist(s) salaries. The hours of operation for the Lenbrook Pharmacy would be from 9:00 a.m. to 5:00



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p.m. Monday's through Friday's and from 10:00 a.m. to 2:00 p.m. on Saturday's or as prescribed by Management, who would also decide upon a location for it.

# Activities

## 21 In-house News @ Noon...

...facilitated by Eric Duke, who is a spectacular spokesman and our Activities Director and probably knows the most about Lenbrook happenings, would keep residents informed of issues of concern to us as they relate to Lenbrook, social and health stats, outings, nursing & retirement, per se... This would be a 15 to 30 minute broadcast that would create a sense of community and vitality and would be yet another step towards making this the finest retirement community ever! Appointed staff would be appointed to keep track of such news (perhaps via radio(s) and/or televised news; it was suggested by Security Officer Robert Shelton that a split screen television and/or system such as would be viewable on all sets in the building, show local news updates on one portion of the screen and the Lenbrook menu on the other) so that important information may be passed on to other pertinent staff and residents in a timely manner.

Examples of What In-house News Would Cover:

Video Clips and Updates On

- ❖ Resident outings (would encouraged participation)

## In-house Activities

- 
- ❖ Men's Breakfast
  - ❖ Bingo
  - ❖ Monthly Birthday Parties
  - ❖ Book Talks (Books of the Week or Month)
  - ❖ New Comers' Socials
  - ❖ LIBRA (Lenbrook In Bulkhead Resident Association Meetings)
  - ❖ "Sew What" (Sewing Classes)
  - ❖ Vespers and Sunday School
  - ❖ Open Dancing (Brookhaven Room)
  - ❖ Stretch & Tone/Tai-Chi
  - ❖ "Great Expectations" Discussion Programs (lounge)
  - ❖ Concerts, Bo Chitty & Happy Hour, etc...
  - ❖ Holiday Salutes from Lenbrook Staff & Residents
  - ❖ Special Lenbrook announcements by the President/CEO, Activities Director, Environmental Services Director, etc...(Pre-recorded broadcasts – as needed, particularly for the weekend, if applicable)

## Thought For the Day (To be aired on Channel 20)

A Thought for the Day would provide daily encouragement and practical wisdom for residents and staff to savor during life's inevitable transitions. Thoughts or adages would be solicited from residents and staff. For example: "When you seek happiness for yourself, it will always elude you; when you seek happiness for others, you will find it yourself." – Dr. Wayne Dyer

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**Annual "Senior Superlative" Elections, just like in High School!**

It would be yet another activity for our seniors to anticipate and enjoy and would magnify special qualities in the elected. Personalized letters of appreciation for patronage would be distributed to all residents during this time just to say thanks for making the Lenbrook decision and for the opportunity, furthermore, for us to be of service. Categories would be as follow:

- ❖ "Most Popular"
- ❖ "Most Loquacious"
- ❖ "Most Talented"
- ❖ "Best Dressed"
- ❖ "Most Attractive" (male & female)
- ❖ "Most Friendly"
- ❖ "Most Flirtatious"
- ❖ "Mr. & Mrs. Personality, etc."

Life is an education; retirement is but a commencement exercise!

**Electronic Activities Board (somewhat implemented)**

One in the lobby (13" screen – mounted on a platform with a VCR and other vital equipment behind the Front Desk – where the Concierge could more readily start and stop the 21 In-house movie(s); this could very well be the same equipment already in use, which would be transferred from the Computer Room to the Front Desk), one to three, perhaps, in the Dining Room (19 to 27 inch screens, perhaps), one of which would be mounted on a platform near the main serving station, one midways in the Dining Room and one in the far end of the Dining Room and/or wherever else in the Dining Room or in general they would best serve. It would be more sophisticated and way less tedious than the old board & letters that were put up each night by the Receptionist/concierge. It would be a swanky visual for Residents, staff and visitors – a statement, moreover, of technological vibrancy. *In terms of electronic menus in the Dining Room, residents and guests would have the opportunity to preview their meal options and make selections from the electronic menu in lieu of or in addition to the weekly (printed) menu.* An ongoing, customized Lenbrook Power Point Presentation (slide show), not simply the Lenbrook menu & movie, would add a little pizzazz to the In-house station. The slide show (with clip art and/or audiovisuals) would key in on special announcements of significance to Lenbrook (In-house, local, national and international news and/or events).

**The Lenbrook Yearbook...**

...would contain photographs and brief, but descriptive narratives of those photographically captured events (a function of Activities). It would be a treasured keepsake for our residents and for their families long after they have passed on. It as well would be – if not exclusively – a welcomed addition, I'm sure, to the Lenbrook Archives. Special activities/outings, perhaps otherwise long forgotten, would be commemorated for residents, their families & friends as well as Lenbrook staff to retrospectively enjoy. Residents and/or staff would pre-order and pre-pay for their yearbooks, which would be ordered upon demand.

The following are examples of what would be included in the Lenbrook Yearbook:

- ❖ Picture of CEO/President and Mission Statement on first page
- ❖ Lenbrook Board of Directors

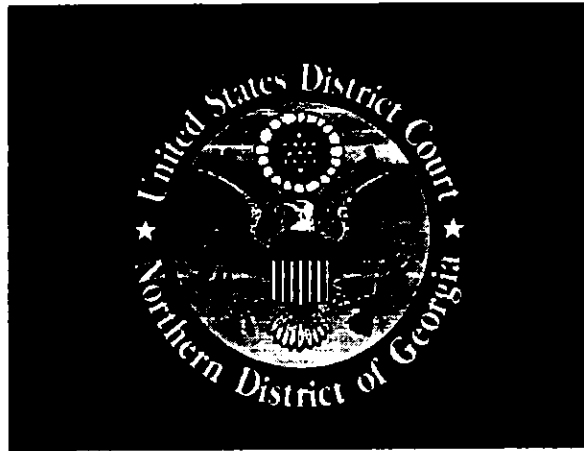
Lenbrook Innovations by Yolanda Martin

12/20/02

- ❖ The Lenbrook Family (all staff) portrait & Departmental portraits for current staff at the time of press
- ❖ Perhaps a collective residential portrait as well as headshots of all residents (current) at time of yearbook press (Each resident's name would be printed under their headshot; that way everybody would know who's who (the residents would be listed alphabetically).
- ❖ Committee members would be photographed together with their respective committees; their names and titles would be printed beneath the pictures, left to right.
- ❖ Other Yearbook photo inclusion ideas would include
  - Senior Superlatives (Best Dressed, Most Popular, etc.)
  - Book Talks, History Lectures...
  - Happy, Hour, Dancing...
  - Committee Meetings, LIBRA (Lenbrook In Bulkhead Resident Association Meetings)
  - Dinner(s) Away, Matinee(s) Away
  - Birthday Parties
  - Special Healthcare Activities
  - Vespers, Sunday School
  - Arts & Crafts, Poetry, Art – from Lenbrook Artists
  - Holiday – Christmas, Easter, Valentine's Day, St. Patrick's Day, etc.
  - Groundbreaking for new building
  - Internal and external shots of this – the old and the new building
  - Cafeteria – Breakfast, Lunch & Dinner
  - Lenbrook staff at work
  - Lenbrook special outreach and missions projects
  - Lenbrook outings – Atlanta Symphony Orchestra, Opera, other musicals, plays, etc.
  - Off guard – fun shots!

Ideas that have not already been suggested





## EXHIBIT / ATTACHMENT

V

(To be scanned in place of tab)



Friday, February 14, 2003

Yolanda Martin  
361 Westview Drive  
Apt. 4  
Atlanta, GA 30310

Dear Yolanda Martin:

You were suspended with pay on February 13, 2002 because we received a complaint from one of your co-workers alleging that due to your behavior they feared for their safety while in your presence. Conduct of this nature violates Lenbrook's Behavior's Policy, which requires all associates to be "kind and considerate" of other Lenbrook personnel. After interviewing the complaining employee, we concluded that it would be in everyone's best interests to refer you for a psychiatric evaluation with Dr. Dave Davis pursuant to subsection (f) of the Lenbrook Medical Examination Policy to determine your fitness to return to work. You responded that you would not attend this evaluation and would "see us in court".

As you know, Lenbrook Square has a duty to provide a safe environment to its employees and residents. Accordingly, pursuant to Lenbrook's Disciplinary Action Policy, all employees are expected to observe rules of good conduct and job safety. In cases involving safety violations, suspension will occur pending an investigation and final review by the Director of Human Resources. Your refusal to cooperate with the investigation process by submitting to a psychiatric evaluation constitutes insubordination. Moreover, after you were informed of your suspension, you produced an "eyes only" copy of Lenbrook's Strategic Planning Report, which was solely for review by Lenbrook Directors. Your possession of this sensitive document raises serious questions regarding your trustworthiness and compliance with Lenbrook's Business Ethics Policy. It has also come to our attention that you spent significant amounts of time during your shift drafting documents on the computer unrelated to your employment duties with Lenbrook.

All of the above factors, when taken in consideration with your two (2) written warnings for leaving Lenbrook premises without permission, your refusal to sign the Concierge Job Description, your insubordinate behavior during a conversation with Debbie Taylor on February 4, 2003 and your antagonistic attitude toward a co-worker has created a situation where your employment with Lenbrook cannot continue. Consequently, your employment will be terminated effective on February 14, 2003. We have taken your word that you will not attend the psychiatric appointment on February 17, 2003 and it has been cancelled.

February 14, 2003

Sincerely,

A handwritten signature in black ink, appearing to read "Allen Christopher". The signature is fluid and cursive, with the first name "Allen" and last name "Christopher" clearly distinguishable.

Allen Christopher  
Director of Human Resources  
Lenbrook Square In Buckhead



## EXHIBIT / ATTACHMENT

W

(To be scanned in place of tab)



State of Georgia  
Department of Labor

## SEPARATION NOTICE

1. Employee's Name Yolanda Martin 2. S. S. No. 418-31-0094

a. State any other name(s) under which employee worked.

3. Period of Last Employment: From 07-01-1996 To 02-14-03

4. REASON FOR SEPARATION:

a. LACK OF WORK ☐

b. If for other than lack of work, state fully and clearly the circumstances of the separation:

Violation of Company Policy  
(Lenbrook Business Ethics Policy)

5. Employee received: ☐ Wages in Lieu of Notice ☐ Separation Pay ☐ Vacation Pay

In the amount of \$ \_\_\_\_\_ for period from \_\_\_\_\_ to \_\_\_\_\_

6. Did this employee earn at least \$2,050.00 in your employ? YES ☐ NO ☐ If NO, how much? \$ \_\_\_\_\_

Employer's Name Lenbrook Square

Address 3747 Peachtree Rd  
(Street or RFD)

City Atlanta State GA ZIP Code 30319

Employer's Telephone No. 404-233-3000  
(Area Code) (Number)

Ga. D. O. L. Account Number 10122903  
(Number shown on Employer's Quarterly Tax and Wage Re-  
port Form DOL-4.)

I CERTIFY that the above worker has been separated from  
and the information furnished hereon is true and correct.  
report has been handed to or mailed to the worker.

[Signature]  
Signature of Official, Employee of the Employer  
or authorized agent for the employer

## NOTICE TO EMPLOYER

At the time of separation, you are required by the Employment  
Security Law, OCGA Section 34-8-190(c), to provide the employee  
with this document, properly executed, giving the reasons for  
separation. If you subsequently receive a request for the same  
information on a DOL-403FF, you may attach a copy of this form  
(DOL-800) as a part of your response.

Director of Human Resources  
Title of Person Signing

2-14-03

Date Completed and Released to Employee

## NOTICE TO EMPLOYEE

OCGA SECTION 34-8-190(c), OF THE EMPLOYMENT SECURITY LAW REQUIRES THAT YOU TAKE  
THIS NOTICE TO THE GEORGIA DEPARTMENT OF LABOR FIELD SERVICES OFFICE IF YOU FILE  
CLAIM FOR UNEMPLOYMENT INSURANCE BENEFITS.

SEE REVERSE SIDE FOR ADDITIONAL INFORMATION.

DOL-800 (R)



## EXHIBIT / ATTACHMENT

X

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## **Lenbrook Performance Review**

**Associate Name:** Yolanda Martin  
**Job Title:** Concierge (3-11:00 p.m. shift/weekdays)  
**Department:** Resident Services  
**Reviewer Name:** Lawrette Pettigrew  
**Reviewer Title:** Director of Resident Services

**Review Period Start:** 07/02/2001  
**Review Period End:** 07/02/2002  
**Last Review Date:** 07/01/2001

### **PERFORMANCE ELEMENTS**

#### **Job Knowledge**

#### ***Meets job requirements***

Yolanda demonstrates competency in the skills and knowledge required for the Concierge position. She is knowledgeable about current developments at Lenbrook and she works with very little supervision. Yolanda displays a good understanding of how her job relates to residents and staff.

#### **Problem Solving**

#### ***Meets job requirements***

Yolanda identifies the existence of problems quickly. She addresses problem solving situations by analyzing options and developing effective solutions.

#### **Communications**

#### ***Meets job requirements***

Yolanda exhibits good listening skills. She is careful to keep others informed in a timely manner.

#### **Initiative**

#### ***Meets job requirements***

Yolanda undertakes self-development activities on her own initiative. She usually indicates when she needs help. Yolanda has developed good ideas to monitor and identify private sitters at Lenbrook. Upon refining her ideas, department supervisor would like to submit them to Human Resources for consideration.

#### **Adaptability**

#### ***Meets job requirements***

Yolanda accepts criticism and feedback well. When a different approach or method is needed, she adjusts her style of working to fit most situations. She adapts well to changes in her job or her work environment. Yolanda is able to manage the competing demands on the job from residents, staff and public calls on the switchboard.

#### **Planning & Organization**

#### ***Meets job requirements***

Yolanda plans and organizes her time efficiently and she usually integrates changes smoothly into existing plans. Yolanda works in an organized manner.

#### **Cooperation**

#### ***Exceeds job requirements***

Yolanda exhibits a high degree of tact and consideration in her relations with the resident. She regularly displays a positive outlook and pleasant manner.

#### **Judgment**

#### ***Exceeds job requirements***

Yolanda confidently makes decisions in all areas of her job. She can handle emergency situations on her own without direction. She can clearly explain the reasoning and provide good support for her decisions. Her decisions are made in a timely manner.

### **Dependability**

### ***Meets job requirements***

Yolanda follows instructions from her supervisor in relation to her duties at the front desk. She assumes full responsibility for her own actions and outcomes. She generally keeps her commitments. However, her overall attendance and punctuality record has been below guidelines.

Since, April 15, 2002, when Yolanda was informed by her supervisor about the importance of being at her workstation a few minutes before her assigned shift, she has been punctual and dependable.

### **Innovation**

### ***Exceeds job requirements***

Yolanda often displays creativity and original thinking beyond the expectations for her position. She generates many usable and ingenious suggestions for improving work. She has developed some innovative approaches and ideas which are evident in the forms she is developing for consideration by Lenbrook to monitor and identify private sitters.

## **SUMMARY**

Yolanda continues to make a significant contribution to Lenbrook and the department, as well as, to the lives of the residents. She is very knowledgeable about her position and quietly, but effectively, meets the demands of the job.

## **PLANS FOR IMPROVEMENT**

**Dress Code** - To adhere to the dress code of the Concierge position at all times while on duty. To wear navy blazer, professional blouses and khaki or gray dress slacks/or skirts (no knit, golf-type shirts allowed) while on duty. The uniform is to be pressed and clean. No tennis shoes, sandals, athletic shoes allowed.


**Telephone Skills** - To answer the phone in a professional manner by identifying Lenbrook to the caller, stating your name and asking how you may help the caller.

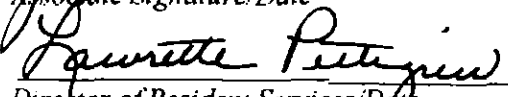
**Being on Time** - Historically, Yolanda has had a problem being on time for her shift. Since, April 15, 2002, she has been at the front desk a few minutes before the beginning of her shift. Her excellent attendance since April 15th and being punctual during that time has shown her commitment to her job and to Lenbrook.

## **EMPLOYEE COMMENTS**

### **Employee Acknowledgment**

I have reviewed this document and discussed the contents with my supervisor. My signature means that I have been advised of my performance status and does not necessarily imply that I agree with the evaluation.

 6/24/02  
Associate Signature/Date

 6/24/02  
Director of Resident Services/Date





## EXHIBIT / ATTACHMENT

Y

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Associate  
Copy**PERFORMANCE EVALUATION**Name Yolanda Martin Position Concierge Date 07/01/01☐ 120-Day☒ Annual☐ Other

SECTION I	Below Requirement	Meets Requirement	Above Requirement	Exceptional
Job Knowledge: Employee demonstrates appropriate knowledge to perform all aspects of his/her position				✓
Quality of Work: Employee completes his/her work accurately, neatly, completely & with attention to detail. Stretches to serve the residents, families & other staff members			✓	
Quantity of Work: Employee completes his/her work in the expected time frame.			✓	
Follows Direction: Employee is responsive & open to taking direction. Listens, isn't defensive.			✓	
Cooperation: Employee treats co-workers & residents with respect & professionalism. Works cooperatively to resolve issues. Is friendly & courteous with residents, co-workers, & families.			✓	
Dependability: Employee is punctual and seldom absent		✓		
Safety/OSHA: Associate follows safety guidelines required for his/her position.		✓		

Comments Very Capable, cooperative and open to suggestions and change. Courteous, professional + gets along well with staff + residents. Demonstrates interest in learning + improving. Valuable to Residents Services + The Lenbrook.

(additional space available on reverse)

Evaluated by: Laurette Pettigrew Date: 06/28/01 (LP)Reviewed by: Laurette Pettigrew Date: 06/28/01 (LP)Employee: Yolanda Martin Date: 06/28/01 (LP)

This evaluation form is intended for use in conjunction with annual merit increases for employees. While the actual range of increases for each year will be established by the Administrator, the relative amount of any employee's increase will be determined by performance as determined by the evaluation of the LPN charge nurse or other supervisor.



## EXHIBIT / ATTACHMENT

7

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**EMPLOYEE PERFORMANCE EVALUATION**

Employee Name <i>Yolanda Martin</i>		Employee No.	Date <i>3/14/01</i>
Department <i>Administration</i>		Job Title <i>Receptionist 3 PM - 10 PM M-F</i>	
Check One <input checked="" type="checkbox"/> Scheduled Evaluation <input type="checkbox"/> Promotion		<input type="checkbox"/> New Employee <input type="checkbox"/> Other:	
Date of Hire <i>6/4/96</i>	Date of last review <i>9/28/98</i>	Date employee began present position <i>7/5/96</i>	Date of next review <i>3/14/02</i>

**Key to Ratings:**

**E: EXCELLENT** - Individual performs all tasks in an exceptional manner. Requires little or no supervision.

**G: GOOD** - Individual performs many tasks well, and all other tasks adequately. Requires little or no supervision.

**S: SATISFACTORY** - Individual performs all tasks satisfactorily. Requires normal supervision.

**F: FAIR** - Individual performs most tasks satisfactorily, but not all. Requires more than normal supervision.

**U: UNSATISFACTORY** - Individual fails to perform many tasks well. Requires close and constant supervision.

**NOTE:** See attached instruction sheet for complete and proper use of this form.

**I. RESPONSIBILITIES**

*Receive and follow reception schedule from supervisor. Answer telephone and refer calls as required by determining nature of call and directing call to appropriate individual of department. Receive inquiries and respond accordingly with established policies. Maintain a current list of residents by name, telephone and room number. Maintain emergency records of Department personnel on call.*

**II. ACCOMPLISHMENTS**

*Has established excellent rapport and "comfort factor" with residents - sensitive to their individual needs and desires. Has demonstrated initiative and interest in performance of duties.*

**III. JOB KNOWLEDGE**

Employee possesses clear understanding of the responsibilities and tasks he or she must perform.

Overall Rating: (circle one) **E** **G** **S** **F** **U** (see key above)

Comments:

*Yolanda is knowledgeable in all facets of her position.*

**IV. JOB PERFORMANCE (QUALITATIVE)**

The neatness, thoroughness, accuracy and overall quality of the employee's work.

Overall Rating: (circle one) **E** **G** **S** **F** **U** (see key above)

Comments:

*Yolanda strives to meet the varied requirements of this sensitive position.*

**V. JOB PRODUCTIVITY (QUANTITATIVE)**

The employee demonstrates a commitment toward achieving results. Tasks are completed efficiently and effectively.

Overall Rating: (circle one) **E** **G** **S** **F** **U** (see key above)

Comments:

*This employee has made a number of suggestions that have proven valuable to the efficiency of the position.*

**VI. DEPENDABILITY**

Employee can be relied upon to complete assigned tasks, and is conscientious about their attendance and timeliness.

Overall Rating: (circle one) **E** **G** **S** **F** **U** (see key above)

Comments:

*Sometimes late to shift because of conflict with personal schedule.*

**VII. COOPERATION**

Employee demonstrates a willingness to work with associates, subordinates, supervisors and others. Respects willingly to changes in procedure, process, responsibility and assignments.

Overall Rating:  
(circle one)

E

G

S

F

U

(see key on reverse side)

Comments:

Yolandita is cooperative and goes out of her way to assist residents

**VIII. INITIATIVE**

Demonstrates an ability to think and act independently. Originates innovative ideas and methods to improve job or complete tasks better.

Overall Rating:  
(circle one)

E

G

S

F

U

(see key on reverse side)

Comments:

Has demonstrated initiative in recommending procedure and operation

**IX. WORK ENVIRONMENT AND SAFETY**

Maintains a safe and pleasant work environment, follows safety regulations, and actively contributes towards a safe workplace.

Overall Rating:  
(circle one)

E

G

S

F

U

(see key on reverse side)

Comments:

Yolandita is aware that safety is a paramount factor in an community both for residents and staff

**X. OVERALL PERFORMANCE**

Overall appraisal of the employee's job performance.

Overall Rating:  
(circle one)

E

G

S

F

U

(see key on reverse side)

Comments:

This is a key position and one which dictates knowledge, personal skills and sensitivity to the needs of senior citizens. Yolandita does it well.

**ACTION PLAN:**

The criteria above is important in order to properly evaluate the employee's performance. The following Action Plan describes the employee's specific strengths and weaknesses, and addresses what can be done to improve their position toward continued growth.

Major weak points are:

Punctuality and professional appearance

These weak points can be strengthened by:

Discussing importance of primary job &amp; punctuality as fellow receptionists. A standard professional blazer uniform for receptionists.

Major strong points are:

Desire to do a good job in a demanding and sensitive position. Personal growth intellectually and morally.

These strong points can be more effectively utilized by:

Additional training by in-service and outside seminars as well as greater guidance by supervisor

Supervisor

Richard A. Quatrone

Date

3/15/01

Reviewing Officer

Date

Has this report been discussed with employee?

☒ YES☐ NO

If "NO", Reason why:

If "YES", Employee's comments:

I will strive harder to be punctual and more professional in appearance to submit ideas that I think will be helpful and I hope as well to gain

Employee

Yolandita Marti

Date

3/15/01

Additional training via attending in-service and outside seminars